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Organization:

Title:

Comments: Dear District Ranger Turner and all involved agency staff members,

I have been following wild horses and wild horse issues for several years now - ever since I saw Ginger Kathryns' PBS documentary on Cloud and the Pryor Mountain herd.

I also have been traveling across the West for a couple of years to photograph, study and enjoy our wild horse herds, so I have a very strong, personal interest in the fate of this herd.

I hope you thoughtfully consider and implement my comments below so that this very small Big Summit herd is still roaming and thriving in Ochoco National Forest when I have a chance to get back out West to continue to enjoy them as I observe and research them for my stories. I, like the vast majority of Americans, love our (supposedly) federally protected wild horses and I am a very interested party in this matter.

Please accept and thoughtfully consider my comments on this proposed draft Environmental Assessment for the wild horses living in and around the Big Summit Wild Horse Territory (WHT) in Ochoco National Forest.

My comments on this Environmental Assessment are as follows:

I strongly object to reducing the herd size to 12-57 horses, which live on less than 3% of this expansive, 850,000-acre Forest. Reducing the number of horses in this herd to this absurdly low number will guarantee their extinction over time due to forced inbreeding. Instead of reducing the size of this herd, its AML should be raised to at least 150 to align with scientifically accepted guidelines per Dr. E. Gus Cothran, an expert in this field, from the Animal Genetics Lab at Texas A&M University.

The Big Summit Wild Horse Territory is supposed to be devoted "principally" for the wild horses' welfare under the 1971 Wild, Free-Roaming Horses and Burros Act. However, you propose to drive them to extinction while permitting vast numbers of sheep (by comparison to the number of horses allowed) to graze there.

The EA fails to consider reducing or eliminating livestock grazing to provide the AUMs needed to accommodate the current low (genetically speaking) population of approximately 135. I strongly support reducing livestock grazing in and around the WHT to provide habitat for wild horses as required by the 1971 Act. Furthermore, reducing livestock grazing would be aligned with scientifically sound Regenerative Grazing Principles developed by RCS Australia.

I strongly support raising the AML especially in light of the fact that USFS received a warning in the 2010 Forensic DNA Profiling Facility, Florida International University report which stated (that because of) "the indiscriminate removal of horses, forcing nonrandom mating among close relatives, the mustang gene pool has the wild horses (and burros) facing a genetic crisis...a minimum of 150-200 horses would be needed to insure genetic diversity, reproductive success and foal viability and survival..." This report utilized data collected from horses gathered from the Ochoco herd that indicated inbreeding in many of the captured horses ... and concluded that this herd cannot afford to be reduced further, or suffer the cruel effects of forced inbreeding.

The EA fails to present any real-life evidence that adding a few horses to a given herd actually increases genetic variability - this theory is entirely based on statistical calculations and modeling and has not been scientifically proven to be true. Therefore, I strongly oppose (1) reducing the number of horses in this already genetically compromised population and (2) introducing horses from other herds into this one.

I strongly support analyzing whether the current WHT boundary is in conformance with the horses' natural, life preserving seasonal movement, since it is an established fact that wild horses have seasonal migratory behaviors based on forage availability.

I deeply treasure my experiences with wild horses especially because of their natural behaviors. I marvel at their social structure and herd dynamics as well as at their quite unique and distinct personalities. In particular, I am amazed at how dedicated to, and how well organized and co-operative they are in guarding and nurturing their young.

Therefore, I strongly oppose any management action that would interfere with or undermine the natural behaviors of these wild horses which is protected by the 1971 Act. Only natural, wild behaviors differentiate wild horses from domestic horses. Gelding (castration), ovariectomies (spaying) and drugs/vaccines that destroy natural hormone production should not be even considered as management actions because they are not in conformance with the Act and have been proven to destroy or interfere with natural wild behaviors.

Of the three Alternatives presented, I strongly prefer Alternative 3, which would manage at an AML of 150 to 200 wild horses. However, I respectfully request that the USFS rewrite this draft EA so that it enables it to fulfill its legislated mission to "protect" wild horses "as an integral part of the natural system of the public lands."

Should gathers be necessary, I strongly support the use of bait trapping, and to be honest, I only support the use of bait trapping as it has been demonstrated to be the safest method used in "gathers." However, If Alternative 3 is adopted, the herd currently is below low AML and gathers won't be needed.

This proposed EA fails to seriously consider actions that would protect these amazing horses and enable the herd to recover from the deleterious management decisions and practices that are slowly destroying the Ochoco Big Summit herd.

Please revise this proposed EA so that it more vigorously conforms to the requirements of the 1971 Act.

Thank you.