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Title:

Comments: The severe legacy damage that overgrazing and logging and road-building for decades, requires active riparian restoration that should be part of the action alternatives for this wild horse management plan. The degraded conditions of many riparian areas in the Big Summit territory (such as those pictured in the EA) and the associated risks to riparian-dependent Sensitive plants, and threats to Redband trout, Columbia spotted frog, along with soil damage in riparian areas. Important to be emphasized: All of these impacts are greatly compounded by ongoing sheep grazing and by severe legacy impacts from logging, road-building, and past intensive and extensive over-grazing by thousands of sheep and cattle in the area, and not just the consequence of wild horses there.

Permanent sterilization can change a wild horse herd's social behavior and lead to younger stallions superseding older breeding stallions, with breeding occurring anyway. Sterilization is thus contrary to supporting the wild character of the herds.

It is not honoring and maintaining the wildness of the wild horse herds to remove so many wild horses that the population is no longer viable (as under alternatives 1 and 2) and by transforming most of the wild horses into tame or dead horses.

Helicopter use for rounding up wild horses will create stress in the horses and increase potential injuries when they are in the holding corral.

I agree with Blue Mountains Biodiversity Project's proposed alternative, which includes: allowing the use of bait trapping for removal of wild horses beyond the upper limit of the AML and the use of temporary horse contraceptives, but no helicopter use and no permanent sterilization; the introduction of wild mares from other wild horse populations to improve genetic variability of the Big Summit population; incorporation of active riparian restoration, including temporary exclusion fencing and native shrub planting in the most damaged riparian areas; prohibiting permitted sheep use of the winter range to reduce overall forage consumption; consideration of reducing sheep numbers permitted in the Big Summit Territory during the next allotment permit renewal process; and monitoring of any decision to euthanize captured wild horses by an outside group supportive of wild horses, such as the Central Oregon Wild Horse Coalition, to ensure that only wild horses not likely to survive on their own and currently suffering are euthanized, and are not euthanized just on the basis of old age or behavior.