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Comments: For such an important plan update, it appears that the Service has not developed a sufficient range of alternatives to carry forward since the beginning of the NEPA process in 2017. None of the alternatives analyzed would implement active riparian restoration, which is cited in the draft EA as a main justification for the removal of wild horses. An alternative that includes analysis of the effects of strategies including exclusion fencing (for sheep or horses) and riparian hardwood shrub and tree planting for the most damaged riparian segments ought to be discussed in future revisions to the draft EA. Failure to address this may point to inaccurate modeling of the preferred alternative. In order to more adequately analyze and disclose the potential impacts associated with this management plan revision, the alternative proposed by the stakeholder, Blue Mountains Biodiversity Project, ought to be considered in revisions to this draft EA. The alternative provides minimum AML numbers of wild horse being 60 and the maximum 125, given that the wild horse population appears to stabilize on its own at about 115-125 wild horses, based on the Figure 26 chart on the EA, although the alternative would be permissive of higher numbers of wild horses once riparian conditions and forage availability improves significantly and/or if the sheep grazing is stopped or significantly reduced in the Big Summit Territory.

This proposed alternative also includes all of the following: 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.

Thank you for your consideration.