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Comments: Objection to the Final Ochoco Wild Horse Herd Management Plan...

The Final plan acknowledges comments that reference concern over the intention to manage wild horses at the chosen AML (12-57), but does not provide a satisfactory response to those comments.

The document simply reiterates the approach taken from domestic animal procedure: introduce a chosen individual for breeding. To add to the domestic animal mindset the document then discusses various methods to keep specific individuals from breeding.

If this were a plan for a livestock producer on private land it might be seen as acceptable. However, this is a plan to manage a wild species as defined by law.

#### FACTS:

- \* The degradation within the Forest has not been shown to be caused by horse use.
- \* Recreation use in the Forest causes far more damage than wild horses. The plan does not differentiate sources of causation.
- \* Domestic livestock production (often documented outside of use permit in trespass) causes far more damage to the Forest. The final plan does not adequately differentiate between horses and livestock (cattle) damages.

Changes made to the Final Ochoco LRMP at 4-11, third paragraph under "Objectives" (noted in Appendix F)  
"Conduct wild horse management on the Big Summit Territory to ensure the maintenance of a self-sustaining population of horses in a thriving natural ecological balance..."

The Final Contradicts the language "self-sustaining" by continuing to insist that an AML so low it requires introduction of horses to keep the area genetically sound is required. "Self-sustaining" implies that the genetic component can reproduce itself indefinitely and in a healthy manner.

In our travels in the territory we noted an increase in recreation that is causing significant damage. Many of those areas are noted as damages caused by horses in the territory. Significantly, the Forest has placed no utilization cages at some of these locations. Our Travels indicate where the areas are primarily used by horses; the damage is seasonal and capable of repair each year, thereby showing no impact that would determine "excess" at the current population level.

The plan does not form a scientific distinction of causation that satisfies any assertion that a reduction in the population of wild horses would have the desired outcome of reversing the damages noted.

"This Court is not saying that the BLM is free to round up wild horses whenever a particular range has an overgrazing problem. Nor is the Court saying that every time the removal of wild horses will have a limited, slightly positive effect on the environment of the range, the BLM can proceed to remove a certain number of those horses..." 203 F. Supp. 1206

The final does not adequately justify managing wild horses at a population level that would not provide "self-sustaining" at a level that would produce a genetically healthy herd.

If the Forest intends to move forward with a plan that requires maximum interference through introduction of

genetic material from outside the herd, the Forest must provide a more distinct and in-depth evaluation that clarifies causation of damages to the Forest.

Only after determining, beyond a doubt, that damages to the Forest (in the specific areas of concern) will be resolved by taking this extreme management style for wild horses, and not reducing domestic livestock or recreation, will the plan be lawfully justified.

The plan in the current form, does not fulfill that requirement.

Sincerely,

Laura Leigh

Wild Horse Education