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Subject: Devil's Garden Plateau WHT - Middle Section

Mr. Christofferson and Modoc National Forest Office:

As a wild horse and burro advocate and an American citizen who has a stake in the sound management of OUR public lands and the protection and preservation of OUR endangered wild horses and burros, I am submitting my comments on the Devil's Garden Plateau Wild Horse Territory Management (DGPWHT) Plan Environmental Assessment (EA), a 10-Year Management Plan for the wild horses in the Devil's Garden WHT in California.

Despite the fact that a massive 3,345 federally-protected wild horses have been removed in the past eight years, Forest Service is now seeking to capture and permanently remove up to 1,134 wild horses from a "guesstimated" population of 1,139 animals the agency claims are currently living in and around the Devil's Garden WHT.

It appears the sole purpose of this proposed action is to pander to special interests, namely commercial livestock ranchers seeking to eliminate the wild horses so they may continue to profit from cheap grazing on OUR public lands with no concern for the preservation and protection of OUR wild horses who have a right to roam freely on the western range as the Wild Free-Roaming Horses and Burros Act dictates.

I strongly urge that USFS revise this plan as it fails to consider important information and issues, such as the cumulative impacts that would result if this Proposed Action were to proceed as currently written.

I am writing in support of Alternative 4: the reduction of invasive, destructive livestock; an increase of the wild horse population; prohibiting unacceptable and harmful methods of population control such as skewing of sex ratios in favor of stallions, which endangers mares and foals and causes chaos amongst the herd; and the use of dangerous fertility pesticides, such as GonaCon, which permanently sterilizes mares by destroying their ovaries. This alternative will also re-establish the original boundaries of the Devil's Garden WHT.

The EA and Proposed Action fail to consider critical factors and information that would significantly alter the outcome of any unbiased analysis.

* The EA fails to analyze the cumulative impact on the "human environment, " including "the relationship of present and future generations of Americans with that environment."

The majority of Americans, myself included, strongly OPPOSE the ongoing annihilation of OUR wild equines on OUR public lands. As government agencies, legally mandated to protect our wild horses and burros, have ramped up their agenda to rid the western landscape of our national heritage for the benefit of a small group of special interests who greatly benefit from turning our public lands into a giant feedlot at bargain-basement prices at taxpayer expense to graze their destructive livestock on our public lands -- especially range legally designated by LAW for the PRINCIPAL use of wild horses and burros -- NOT commercial livestock!

The proposed action continues the misguided destruction of one of the last significant wild horse herds managed

by USFS in California and the EA fails to consider or analyze the negative impacts of such a proposal on the wild equines and their environment, as well as the surrounding wildlife in this targeted area.

The Low AML (arbitrary management level) for this herd was reduced from 275 to a mere 205 horses -- which is especially significant as the this is significant as the EA states that wild horses may be removed to low AML. Given the inequality of forage allocation favoring invasive livestock over protected wild horses in the Forest -- and on all USFS-managed public lands -- the needs of wild horses must be prioritized over livestock in the WHT. Wild Horses are a protected species, livestock in NOT.

However, the EA fails to acknowledge how this Proposed Action would perpetuate this gross bias in favor of special interests to the detriment of federally-protected wild horses. Such bias contradicts the agency's stated objective of "balanced uses".

As written, the Proposed Action would significantly and negatively impact my relationship, and those of myriad Americans and tourists alike, with the Modoc National Forest where the
Devil's Garden wild horses currently roam freely and rightfully on our public lands.

* While the Proposed Action includes a portion of the public lands in the "middle section" as part of the DGPWHT and zeroes out a significant portion of the public lands in the "middle section", the EA fails to analyze the resultant negative impacts on the range from forcing wild horses through a narrower "connector". Wild horses must not be punished for the lack of cooperation by private property owners for failing to fence out their property. In fact, there are dozens of miles of fencing scattered throughout the DGPWHT marring this wild horse habitat.

The EA fails to recognize significant interests in not reincorporating all public lands in the
Middle Section as it is a prime grazing habitat and an important area for wild horse distribution
throughout the WHT.

* The EA fails to analyze the cumulative impact of zeroing out wild horse habitat
in targeted locations throughout the WHT. Such an action would negatively impact the
environment for people as well as the wild horses, not to mention the ongoing damage that would be caused by allowing livestock to continue their destructive grazing.

What is the point of eradicating wild horses in targeted areas only to replace these beneficial and protected animals with invasive, destructive livestock? The agency cannot claim such an action would be to protect the range from perceived damage by wild horses if livestock would be allowed to continue grazing in these same areas. Such "management" policies merely highlight the bias with which USFS favors livestock interests over those of wild horses. Livestock is NOT a protected species and ranchers grazing their cattle on our public lands is a PRIVILEGE, NOT a right! Such inequitable allocation of forage and habitat in favor of an invasive animal at the expense of a fast disappearing species that is protected by LAW must not continue!

Wild horses and burros are NOT overpopulated and are, in fact, being managed to extinction! The National Academy of Sciences said as much and found the methods of "guesstimating" herd numbers highly suspect. The incessant roundups, removals, chemical and surgical sterilizations, roundup-related deaths and zeroing out of legal herd areas are puhsing these iconic animals to the brink. Not to mention, roundups on such a massive scale as is being proposed for the DGPWHT would expose these animals to grisly slaughter, overwhelmingly opposed by the majority of the American people.

Zeroing out any wild horse herd is unacceptable! These iconic animals are to be preserved for future generations, NOT wiped out to pander to special interests. The majority of the American people, including myself, demand the presence of wild horses and burros on the western landscape in GENETICALLY VIABLE, SUSTAINABLE, REPRODUCTIVE herds, HUMANELY managed ON THE RANGE on OUR public lands, where

they rightfully and lawfully belong! These national treasures are to be preserved for future generations, NOT wiped out to pander to special interests.
Zeroing out any wild horse herd area is unacceptable!

* The EA fails to seriously analyze AML (arbitrary management level) and limits "this AML evaluation ... to the proposed Middle Section." USFS must examine how AML could be increased if portions of the public lands were not zeroed out.

The EA and Proposed Action as written fail to consider important data and issues and continues the business as usual management policies of elevating the interests of commercial livestock ranchers over the interests of federally-protected wild horses who, by LAW, are to be managed as the PRINCIPAL users of their own rightful habitat.

I, along with myriad Americans who cherish OUR wild horses and the freedom that they stand for, would be harmed if this misguided roundup and removal operation were to proceed, seriously compromising our ability to view these magnificent mustangs who are our heritage and whom we so highly cherish. I, therefore, strongly urge USFS to cancel this plan to eradicate wild horses living freely in the Devil's Garden Plateau Wild Horse Territory.

Sincerely,