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Comments: Dear Supervisor Christofferson:
Please accept the following comments on the draft Environmental Assessment (EA) for the Territory Management Plan (TMP) for the Devil's Garden Plateau Wild Horse Territory (DGPWHT).

I strongly oppose the Proposed Action that will continue to prioritize privately owned livestock over federally protected wild horses by 1) maintaining an absurdly low Appropriate Management Level (AML) for horses; 2) allowing minimal expansion of the Middle Section; 3) implementing GonaCon, a unproven form of fertility control; and 4) maintaining current levels of cattle and sheep authorized to graze on the Territory.

Further, the EA raises more questions than it answers. In large part this is because the EA lacks pertinent and scientifically required information that must be analyzed before moving forward with the Proposed Action. For example, It provides no methodology for AML determinations in the Middle Section; therefore, these determinations are arbitrary and appear predetermined.

It ignores current research that GonaCon is experimental in nature; therefore, the impacts cannot be analyzed because they are unknown. Further, it provides no research on the use and efficacy of remote wildlife vaccine delivery systems.

It provides no logical parameters for the decision to add only a narrow 114-acre corridor though the Middle Section to connect the East and West sections of the DGPWHT. This is especially important because the horses have historically wandered into other parts of the Middle Section.

It provides no evidence that differentiates the impacts of wild horses from private livestock on forage and water resources; therefore, claims that wild horses are solely responsible for range health degradation amount to nothing more than scapegoating.

It ignores/dismisses the research that finds that both wolves and mountain lions are apex predators who can help control wild horse population.

It provides no methodology/data for the inequitable distribution of forage resources that favors private livestock over federally protected wild horses. I appreciate that the United States Forest Service (USFS) has included Alternative 4 in the draft
EA. This alternative will 1) increase the AML to 500-1,000 horses while significantly reducing private livestock grazing; 2) limit the use of fertility control to PZP; and 3) enlarge the boundary of the DGPWHT.

However, when developing the final EA for the TMP for the DGPWHT, I ask the USFS to include the following mitigation measures:

PZP must be implemented before reaching AML. This is consistent with the

recommendations of the 2013 National Academy of Sciences report on the BLM Wild Horse and Burro Program. In the absence of this scientifically proven form of fertility control, the inhumane, expensive, and ineffective management strategy of massive roundups and removals of wild horses that was the cornerstone of the 2013 TMP will continue.

Rangeland improvements, such as the development of water sources and the removal of at least 50 miles of fences, must be implemented to allow the free movement of wild horses across all parts of the DGPWHT. This would result in fewer horses moving off the Territory as well as wider distribution of horses across the Territory and use of its resources, including forage and water.

Specific details about the proposed reduction of private livestock grazing, such as when, where, and how much, must be disclosed.
If any horses are removed, utilize only least intrusive capture methods, such as bait/water trapping that is much less expensive and traumatic for the horses than helicopter roundups.

Any horses removed from inside or outside the DGPWHT must be transferred to other USFS Wild Horse and Burro Territories. This would be in line with Regulation 36 CFR § 222.69(c) that directs the agency to relocate removed animals to other Territories.

Finally, given the scope and controversy of this draft EA, I ask that the USFS prepare an Environmental Impact Statement that provides for an actual, reason-based analysis of its Proposed Actions.

Thank you for your consideration.