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U.S. Forest Service

Modoc National Forest

Attention: Environmental Comment

Supervisor Christofferson

225 W. 8th st.

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To Mr. Christofferson,

Thank you for the opportunity to comment on the Devil's Garden Plateau Wild Horse Territory (DGPWHT) environment report. My expertise as a Master Watershed Steward, lifetime horse owner and admirer and work with many nonprofit organizations is the basis of my comment .

I support Alternative 4 which reduces livestock and ends objectionable management actions like the use of GonaCon which destroys mares' ovaries, and reestablishes the original Wild Horse Territory. I also support the end to the use of helicopters for gatherings especially because of the rocky terrain of Devil's Garden Plateau.

The Environmental Assessment report E-A) and proposed action is extremely biased placing blame on wild horses for the destruction of the ecosystem by cattle and fails to consider the science that would change the outcome of any unbiased analysis. The Forest Service would have the public believe and present a case that they are genuinely concerned, but yet are considering further degradation of the ecosystem by allowing the ranchers to continue livestock grazing, conducting business as usual and turning a blind eye to the science.

Livestock grazing (cows and sheep) causes habitat degradation. Articles and first hand accounts of the habitat destruction are numerous. One account from the Society of Environmental Journalists gives an account of the cattle destruction of Modoc Plateau back to 2010:

"At the first National Forest site we visited in California's remote Modoc Plateau, nearly every plant had been chewed on by cattle. The botanists, there to track down and collect seeds from rare plants, pointed out the soil erosion from stomping hooves. The cow pies were everywhere, unavoidable on the steep roadside slope. And they crushed or squished under our boots. The seeds we had come to collect , from a delphinium only known to exist in a handful of places in the state, were mostly gone before the botanists could preserve them-disappear in the digestive tracts of hungry ungulates. At the base of the hill along the river below, we could see the offending cattle. And even before we saw them, we could hear their lowing." Lauren Leffer continues, "ChristaHorn, the trip coordinator and plant conservation researcher at the San Diego Zoo, pulled up the records for the delphinium at our location on her field tablet. Cattle damage had been note at this site all the way back in 2010. This time, before we moved onto the next place. Horn submitted a note to the purple plant's digital file. She indicated that cattle damage wasn't just present at the site but that it posed a real threat to the flower's survival there."(Lauren Leffer reports for Earther Jan. 29,2023. (<https://gizmodo.com/nobody-is-happy-with -the federal-grazing-program-1849865593>)

Livestock are recognized by science world wide as the cause of degradation of range and forest and as the main culprit in desertification of the land, yet USFS persists in removing wild horses, a keystone species in the trophic pyramid, to increase cattle grazing. Wild horses shape landscapes in many of Europe's rewilding projects but only when numbers are significant. Rewilding Europe has documented:

"Horses are prime candidates for rewilding and restoration because their genes are not changed with the domestic process."

The report also fails to look at the destruction of one of the last wild horse habitats that is very special to millions of Americans. The law is clear that wild horses must receive priority over livestock. The herds' low numbers from the other alternatives would weaken the health of the remaining wild horses.

The monetary analysis also fails to bring to light the improvement in economy and natural services wild horses and wildlife bring to the table, concentrating on only the profits the small handful of ranchers would receive and ignoring the community and all the local folks that would benefit from nature's services. Another benefit is ecotourism that can be developed for the community.

It further fails to take into consideration the economic impact and national ecological services wild horses have on the environment. For instance; the wild horses' ability to increase plant diversity through their fertilization and seed dispersal over the 268,000 DGPWHT acre, thus influencing positively the biodiversity of plants and other wildlife. They also provide trails and dig wells for water for wildlife. A study has revealed that wild horses in search of water can create water sources that supply other wildlife and plants with ecosystem benefits. In reality it is the wild horses that increase water availability that are then used by large numbers of species and decreased distance between water sources. (Science Volume 372 Issue 5541, DOI:10.11261
By Erick J. Landgreen April 30,2021.)

They help prevent forest fires and save the forest service; during the life span of just one horse over \$70,000 in fire mitigation services provided,
(this dollar amount is supported by Captain Bill Simpson founder of the Wild Horse Fire Brigade) totaling over 70,000 million dollars in wildfire mitigation for the 1,000 wild horses Alternative 4 would provide in the next couple of decades.

Also the proposed action, as illustrated in Figure 1 proposes a delineation of the middle section: completely separating the WHT into 2 parts-East and West with no connective corridor. While the rest of the country and world are building and restoring wildlife corridors to slow the decline of wildlife and loss of biodiversity, the USFS is pursuing the exact opposite at DGPWHT by this proposal. The new proposed delineation of DGPWHY would cause several life threatening problems to the wild horses and wildlife. For instance, the loss of critical water sources and grazing pastures which would put a life threatening strain on the wild horses. With over 50% loss of our forest dwelling wildlife in the last century with the biggest factor being habitat fragmentation, the resulting fragmentation from this boundary change of their habitat would be catastrophic to the wild horses, other wildlife, the land and people. By decreasing DGPWHT in the middle section, fragmenting the wild horse territory, this will also impair the key ecosystem functions affecting the smallest and the most isolated fragment in the Modoc National Forest. This adverse destructive occurrence on these small ecosystems from the law of land connectivity is documented with science;

"A synthesis of fragmentation experiments spanning multiple biomes and scales, five continents, and 35 years demonstrates that habitat fragmentation reduces biodiversity by 13 to 75% and impairs key ecosystem functions by decreasing biomass and altering nutrient cycles. Effects are greatest in the smallest and most isolated fragments, and they magnify with the passage of time. These findings indicate an urgent need for conservation and restoration measures to improve landscape connectivity, which will reduce extinction rates and help maintain

ecosystem services." HomeScience Advances Vol. 1, No. 2 Habitat fragmentation and its lasting impact on Earth's ecosystems.

This cascading destruction of the mini ecosystems can spread to all surrounding ecosystems. Becoming irreversible with the passage of time; affecting wild horses and all other wildlife. Perennial grasses and vegetation will and have given way to annual grasses that supply less nutrients. The stress to the wild horses and wildlife from the loss of nutrients will result in poor health of the animals.

Addressing Wild Horse Territory Planning, this action every 15 to 20 years is not adequate. Every WHT plan should have the goal for success with the wild horses given the priority over livestock. The multi use must be planned with the wild horses having the principal use. The AML's need to be revisited with wild horse managed principally on their land:It

In the United States District Court June 28,2022. Civil Action 19-3506 Judge Kollar-Kotelly responded with the following ruling:

"...the Court agrees that BLM's ten-year deadline exceeds its discretion, per statutory command, to "immediately remove excess animals from the range so as to achieve appropriate management levels."

The Forest Service and Bureau of Land Management cannot continue to create 10 plus year plans to gather wild horses whenever they are over AML. The agencies must follow NEPA regulations and at a minimum, do an E-A for every gathering planned. This ruling returns to the American public their right to due process. It is the intention of the ruling that all gathers not be written in long term wild horse planning. With climate change, 10 years plans are no longer usable.

The Forest Service continues to hang on to the expensive and abusive practice of helicopter roundups, causing severe injuries and death. The volcanic terrain causes severe injuries when chased by helicopter and chasing them through the forest causing life threatening gashes to their bodies. In a letter signed by thirty eight members of congress, Representative Ted Lieu of California recently called for the halt of roundups. Hew writes, noting significant welfare concerns:

"The agency appears to lack a comprehensive and enforceable animal welfare program to guide the handling and care of animals during helicopter roundups, during transport, and in off-range holding facilities. The agency appears to lack adequate policies and procedures to screen potential adopters and purchasers to ensure the welfare and safety of the horses."

In a recent interview, a member of the Modoc National Forest staff described the condition of Devil's Garden wild horses after being driven by helicopter as horrific:

"You can't believe their condition. "We have seen ... cuts to the bone,"USFS employee declared. "just about every wild horse gathered was affected."

USFS has recognized in the EA horses receive significant injury during helicopter roundups but attempts to explain and downplay the horses injuries. In addition to visible injuries: heat stress and overexertion result in damaged organs causing extreme health issues for years after the roundups. The anxiety from separation from family units and foals from their mothers is another health factor that USFS must consider. California protects their horses with the animal protection law and I urge California's Modoc National Forest to honor California's animal protection law and stop the abusive helicopter roundups and give horses the respect and protection from injury as the law states.

Thank You

Linda Oswald