

Data Submitted (UTC 11): 5/13/2024 9:45:35 PM

First name: Craig

Last name: Downer

Organization:

Title:

Comments:

Thank you for the additional opportunity to comment on your proposed Devil's Garden Plateau Wild Horse Territory Management Plan. I gave earlier input a few months ago through your portal.

I have gone through the various Alternatives you have presented and have serious objections to all of them, but definitely favor Alternative 4 of those presented. Alternative 4 would give the wild horses more habitat to circulate in order to satisfy their year-round survival needs, including forage, water, shelter, and special habitats related to successful reproduction and the nurturing of young, including by educating them on how to survive in their home ecosystem. However, I still feel this alternative falls short of the needed population level and resource allocation, including habitat space, that should be required to assure a long-term-viable and ecologically well-adapted herd. In order to accomplish this, there needs to be a serious reduction in livestock within the Wild Horse Territory (WHT) to allow for a fairer horse population size. Also, other factors need to be considered, such as damage to the ecosystem by vehicles, hunter impacts, severe natural predator killings, as by Animal Services, over-fencing within the DGPWHT, etc.

In considering the relative proportions of population numbers and forage allocations for the various species present, I see that the habitat resources needed by a genetically viable, ecologically well adapted, and individually healthy wild horse herd has been overlooked! The preponderance of forage, water, habitat occupation, etc., is being given to the public land ranchers' livestock, while the horses are being given only a small fraction of the survival resources they require. This runs contrary to Section 2 c of the Wild Free-Roaming Horses and Burros Act (WFHBA) that clearly states that a wild horse/burro range, or legal area, is "the amount of land necessary to sustain an existing herd or herds of wild-free-roaming horses and burros ... and which is devoted principally but not necessarily exclusively to their welfare ...". It has become increasingly apparent to me that in the DGPWHT, the wild horses have been marginalized and that your current proposed plan continues to do this though contrary to the WFHBA.

Water sources are being tightly controlled for livestock, while little consideration is being given for the wild horses' need for adequate water. For example, there are many projects to supply livestock with water tanks, but hardly any such projects for the wild horses. Also, many fencing stretches are favoring livestock operations while ignoring the wild horses' right under the WFHBA to maintain their free-roaming lifestyle.

As far as the wild horses' population assignment by Modoc National Forest goes, in the proposed alternative the appropriate management level (AML) of 206 low to 402 high, for a mean of 304 horses signifies that, at the mean, there would be ca. 1,000 acres/1.56 square miles per individual wild horse. This is an extremely sparse population density and does not adhere to the true and core intent of the WFHBA! Rather, it does a grievous injustice to this unique and historic wild horse herd as well as to the thousands of people who greatly appreciate and come out to visit them. I, for example, have been observing these horses since the early 1980s and have given repeated input to Modoc NF in hopes they will be treated much more fairly: given truly genetically viable population numbers, allowed to harmoniously adapt and enhance this special ecosystem, and not be overly restricted in their movements, reduced in number, and altered - treated like domesticated animals!

Even with Alternative 4 with its AML of 500 low to 1,000 high, for a mean of 750 horses, there is an inadequate population. At 750 horses in 286,067 acres, there would be 381 acres/0.6 square miles per individual wild horses, which is still a quite sparse population density, and relative to the livestock grazing animals in the WHT only a small fraction!

As concerns the application of GonaCon mare-fertility suppressant drug, I am very concerned that this will have extremely detrimental effects upon the wild horses - indeed, already is producing these! These effects including permanent sterility and the creation of a wild horse herd in decline that loses its vitality and survival fitness. Also, GonaCon affects the hormones of the mares and alters their moods. Consequently, it also alters their social relations, producing discontent and agonistic behavior among band members. The administration of GonaCon is very unnatural and is quite inconsistent with the true spirit and intent of the WFHBA! Drugging of wild horses is a serious form of domestication that tortures these animals, distorts their natural behavior, and causes them to be unfit as individuals and dysfunctional as a society.

As you must know from my earlier inputs, I greatly favor the Reserve Design and Rewilding strategy for wild horse/burro conservation. This nature-respectful approach recognizes the ability of mature social band to limit reproduction and herd size expansion. However, it is precisely these bands that are broken up by the extreme roundups of the wild horses. These destroy their inter-generational cohesion as is manifest in their social structures. These mature social units, carrying on from generation to generation and preserving traditions, are greatly important. For example, older horses educate the younger horses so that they know how to survive in each particular ecosystem, each of which has its special survival challenges. Reserve Design would allow the wild horses to harmoniously fill their ecological niche. Then, by means of an intelligent reserve limitation, wherever possible by means of natural barriers, this would result in the horses limiting and stabilizing their population size and at a wholesome and long-term-viable level. This relates to horses being "climax" species, i.e. a member of the more permanent "climax" successional stage, or "sere" as ecologists call this, as ecosystems develop over time.

As concerns the "Middle Section," while I favor Alternative 4 because it gives more space and habitat requirements for the horses, even in this is needed a more thorough analysis. I am concerned that this tight bottleneck between two major components of the DGPWHT will cause serious problems for the wild horses, especially as related to their natural movement patterns, including seasonal. This involves their natural forage rest rotation over the seasons, as well as soil creation and seed dispersal patterns that are of great value to the ecosystem. And this also involves their great service in mitigating fuel load, or dry flammable vegetation, thus greatly helping to prevent catastrophic wildfires, that is such a looming concern today with Global Heating. In short, I strongly urge you to establish a much broader connection between the two large portions of the Devil's Garden Plateau WH Territory.

As I wind down, I wish to emphasize that I object to the lack of an honest evaluation of the much larger numbers and concomitant resource allocations that are assigned for livestock, both cattle and sheep, within the DGPWHT. It is very deceptive to ignore the monopolization of resources by livestock that benefit several ranchers while treating the legally rightful occupiers of the DGPWHT - the wild horses - as somehow being destructive misfits, as I discern throughout your EA. A few to several hundred wild horses does not begin to produce the ecological impacts that several thousand cattle and sheep do! It is disingenuous to ignore this factor and is a major flaw in the EA.

Before I close, I must state that I am struck by your assessment's failure to recognize and promote the many positive contributions that the returned-native wild horses make to this scenic and relatively well watered ecosystem. This includes the increased building of healthy soils, the increased dispersal of intact seeds of a great variety of plants including many natives, e.g. bunch grasses, the horses' contribution to the food chain/web as a prey and scavenged species, and their significant mitigation/prevention of catastrophic wildfires through consumption of dry flammable vegetation and through building more moisture retaining soils and more biodiverse flora and fauna. And, finally, I would be remiss to forget their cherished to the thousands of visitors they attract and who greatly appreciate their natural beauty and the high-order harmony these horses lend to the life community here. And this also translates into their important contribution to the local economy.

--I look forward to your thoughtful response to the points I have made. And I wish to state that I have great

respect for the role of government in seeing that wisdom and justice prevail in our nation and our world. We Americans can shine as a virtuous example of how to treat our wonderful wild horses In The Wild.