

May 3, 2020

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Subject: Public Input to Ochoco National Forest Draft E.A. for Amendment to Big Summit Territory Wild Horse Herd Management Plan. Comments due: Monday, May 18th, 2020.

Link to Environmental Assessment: project web page:
<http://www.fs.usda.gov/project/?project=46228> under Project Documents – Analysis or
https://www.fs.usda.gov/nfs/11558/www/nepa/100829_FSPLT3_5268324.pdf . Preferred comment method: <https://cara.ecosystem-management.org/Public/CommentInput?project=46228>

Dear Public Official:

Spring greetings & hope you are staying well. I have just finished reviewing your proposed amendment to the Big Summit Territory (BST) Wild Horse Herd Management Plan. While I appreciate this opportunity to comment on the proposed & other two alternatives, I am particularly struck by the consistently negative bias surfacing through your document toward the “wild” naturally living horses that have legal rights to adequate habitat requirements for their survival at a viable level within their legal Big Summit Territory. I notice your consistently minimizing or ignoring the horses’ value & contribution to the life community, alongside a consistent implication of blame placed upon this herd, whose rights to adequate resources & thriving population numbers are covered under the Wild Free-Roaming Horses & Burros Act (WFHBA) & several other acts including the Multiple Use & Sustainability Act, FLPMA, PRIA, NEPA & even such acts as the National Historical Preservation Act & the Endangered Species Act.

Throughout your document, there is a consistent ignoring of major contributing factors to environmental disturbances & decline along with a marked arbitrariness in the assignment & application of non-impartially applied standards aimed at discrediting & nearly eliminating the wild horses from this their legal area. For example, there is no calling into question the predominant forage consumers: the various permitted ranchers’ livestock, mainly sheep, as well as the serious impacts that logging operations, off-highway-vehicles (OHV) & their roads & trails, big game hunting activities, rule-ignoring campers & recreationalists & erectors of barbed-wire fences are causing. In late April 2017, I visited the Big Summit wild horse Territory & camped within the territory in order to observe the wild horses & assess conditions of this ecosystem, including past & ongoing negative impacts upon the life community. My assessment was published within a more extensive report on April 6, 2018, for my non-profit organization. It is entitled: “Report on Five Wild Horse Herds and Herd Management Areas (HMA) in Oregon ... “ & the link to this is: https://thewildhorseconspiracy.org/wp-content/uploads/2018/04/REPORT-ON-OREGON-WILD-HORSE-HERDS-AND-HABITATS-ON-THEIR-LEGAL-BLM-AND-USFS-AREAS-Table-of-Contents-version-of-4-6-18_r.pdf
For your convenience, I am copying the BST section of this report below but would encourage your

reading all of it to gain a better idea of how wild horses are being treated throughout Oregon including on BLM lands. Here is my report's BST segment:

"BIG SUMMIT WILD HORSE HMA (aka Territory) on Ochoco National Forest

This is the only wild horse territory that is exclusively managed by the US Forest Service in its northwestern region. Located in the Lookout Mountain Ranger District of the Ochoco National Forest, it was not described on the official USFS website (<https://www.fs.fed.us/>), though the District office in Prineville had a detailed handout describing it as an HMA. It was listed on the National USFS website (composed on February, 2014), which indicated its assigned AML as 60 wild horses (no minimum or maximum given) and a current 2014 population of 138. Of singular interest is that out of a total 53 territories for wild horses/burros, 19 were listed as "Inactive" and, so, presumably devoid, i.e. "zeroed-out", of wild equids. No acreages were given but an estimated total wild horse population of 5,776 and an estimated burro population of 707 were given for all US Forest Service lands in the United States.

Though the Big Summit Wild Horse Territory figured on a large-scale map of wild horse and wild burro territories on the current 2018 USFS website, it did not figure in the alphabetical listing of all the territories. From handouts and public article information as well as from my personal visit to this territory, I was able to better assess what was transpiring with this legal herd and its habitat. Though legally established by the 1971 WFHBA, it was not until 1975 that the Ochoco National Forest practically established this small 27,300-acre (42.7 square mile) "Herd Management Area" for the wild horses living here. Much later, and because the management plan for this herd had not been updated since 1975, a special meeting took place from noon to 7 PM on November 17, 2015, at the Ochoco National Forest office in Prineville. Yet, to date (early 2018) no final decision has been made as to the exact content of the Herd Management Plan.

In late April 2017, on entering the HMA, I immediately observed a band of twelve rather nervous, lean and muscular wild horses along an overflowing stream a few hundred yards above a campground. Upon detecting my presence, they quickly and energetically dashed up a steep, rocky hillside to the south of the stream. A shrill series of whinnies was then heard several hundred yards to the north from the pine-covered hillside. This stirring alarm issued from a wiry, dark stallion obviously urging his band to retreat. Profusely sweating and with matted coat, his concern and anxiety were palpable. Although at first I thought I was the cause of the wild horses' panic, I later thought that something or someone was stalking this band from the north, for the stallion seemed to have been agitated for some time to produce such a sweat, and he had just crashed down a mountain slope, a sign of evading pursuer(s). But could he have feared for his band's security due to my close proximity to his charges, who themselves were very afraid and shot off like rockets when I approached them? After carefully reading the trenchant and truth-seeking Appendix F, I am more inclined to believe that these horses were deathly afraid of me just because I was a tall man with a cowboy-like hat. Indeed, the behavior of the band and the stallion closely resembled that of Big Summit bands due to ongoing persecution (see Appendix F).

The HMA itself is mountainous and covered with medium-to-tall conifer forests, chiefly yellow pines (*Pinus ponderosa*). It is well watered, and had a number of gushing springs and streams as well as some sizeable lakes brimming full of water when I entered here. There was still so much snow that I could not complete the loop road due to high drifts. I particularly recall the lovely Walden Lake, which I hiked around but encountered no recent sign of wild horses – which struck me as very odd given this was right in the midst of their legal territory and would present a major source of drinking water.

Overall, I observed that sheep were taking most of the forage in the HMA and a relative small portion seemed to be going to the few wild horses here. This is confirmed by the exacting research presented in Appendix F. Indeed, the sheep ranchers are being allowed to consume the great majority of the nutritious forage during the prime growing season of spring and summer. Some areas of meadow and livestock holding areas were overly trampled by livestock. Of greatest concern was the fact that I saw so few horses or sign of their presence, although I nearly completed the road loop and made frequent stops and hikes into the HMA's interior. There were also tight, four-strand, barbed-wire fences along the eastern boundary of the HMA. These and other ... fences constituted hazards to the wild horses, interfering with their healthy daily and seasonal foraging, watering, and socially related movement patterns – and the reduction of the herd gene pool due to their reduced ability to intermingle.

During my days at Big Summit, I observed and photographed many details. It was plain that the chief allocation of HMA resources was going mainly to bordering ranchers. Also, loggers and wood gatherers were being given a liberal license to remove logs or firewood; and their incursions by heavy trucks were producing significant erosion of top soils that were causing much damage to the health of the ecosystem. Hunters were also being very much catered to, as attested frequent ATV trails, signs of deer and elk butchery including hanging poles along with campfire rings with parking places.

Discussion of Findings and Plea for Action

During June of each year, volunteer and USFS workers count the Big Summit wild horses. They go either by horse or on foot throughout the accentuated topography of the entire HMA. Ca. 150 wild horses were counted in June, 2015. A non-profit called the Central Oregon Wild Horse Coalition (COWHC) exists As well as participating in the count, COWHC monitors and advocates for the wild horses of Big Summit and several other legal areas. Since the revised plan for this herd is to be finalized later this year (2018), substantive inputs on behalf of this herd and its habitat could help restore the herd to a viable level and assure a benign future for these unique and inspiring mustangs and the many people who value them, many of whom view them.

At a mere 60 horses, the Big Summit AML would be genetically non-viable (Duncan 1992). This unfair AML represents $27,300 \div 60 = 455$ acres (0.71 square mile) per allowed individual wild horse. This arbitrary figure is unnatural and ignores the existing niche space for horses in this ecosystem, and how the horses' filling their niche actually restores balance to an ecosystem that is overly burdened by all the many ruminant-digesting herbivores such as cattle, sheep, and deer that modern society overly promotes but which in a more balanced situation the horses themselves would complement but at levels more appropriate for each species in question (Hansen et al. 1977 [in *Journal of Range Management* 30(2): 116 ff], Downer 2014 a & b). Indeed, as sources presented in Appendix F indicate, even the ... officials had to admit that the horses grazing down of coarser drier vegetation gave a boost to greener and more nutritious vegetation for the very large flocks of sheep that graze the HMA.

This inadequate AML should be considered illegal, for it is contrary to Section 2 (c) of the unanimously passed Wild Free-Roaming Horses and Burros Act and conflicts with other mutually supportive acts, including the Multiple Use and Sustainability Act and the National Historical Heritage Act. Forest Service officials, Congressmen and Senators alike should recognize the “principal” status of these unique “national heritage” and “returned North American native” wild horses (MacPhee 2013). Both the AML designation and its associated resource allocation for the Big Summit HMA should be revised. This

urgently needed reform to upgrade the herd and its habitat could be accomplished this year ... provided concerned and enlightened people take the necessary steps at upcoming meetings, etc.

Although the Big Summit HMA is a charming area, an inescapable and ominous feeling arose in me that those who possessed the most right to naturally live here – the wild horses – were precisely those who were being most persecuted – even blamed for contrived grievances – by vested interests and authorities alike. ... These unique “mountain forest” horses deserve their fair share of this land and its resources as well as precious freedom. They are highly evolved, spirited, peace-loving, and positively contributing presences – and they are definitely a deeply rooted, returned native species here in North America (MacPhee, 2013. <http://www.thecloudfoundation.org/reading-room--faq-s-article/wh-ret>). Additionally, a large part of the local, national and international public greatly appreciate them and want to see their fair and just treatment. They must not be singled out for blame, or “scapegoated”. Eventually such blind persecution would cause their disappearance even from legal areas such as the Big Summit HMA where they possess the most right to live. Ironically, though they are being disreputably persecuted and squeezed out here, it is precisely their restoration to greater, truly viable population levels that could revive the local economy (see Appendix F).

My sincere hope for the new year is that the new plan that emerges for this herd and its legal habitat will not be all about how to further restrict and hamper these worthy denizens of Big Summit, as for example through the harmful and vigor-compromising darting of PZP to prevent mares from conceiving and in a population that is already genetically subpar. Rather, my prayer is that more enlightened concepts including principally Reserve Design (Downer 2010, 2014 a & b; Peck 1998) will be adopted and that this herd will be allowed a larger, truly viable population and, concomitantly, a much fairer portion of the forage, water, and other habitat requirements derived from this unique mountain ecosystem where they play such a benign and life-enhancing role, paying pack their natural home multifold.

Disastrous herd “management” plans that are contrary to Section 2 (c) of the unanimously passed Wild Free Roaming Horses and Burros Act and also conflict with mutually supportive acts such as the Multiple Use and Sustainability Act and the National Historical Heritage Act should be abandoned as Forest Service officials, Congressmen and Senators alike come to recognize the legally “principal” status of these unique “national heritage” and “returned North American native” wild horses.”

[Continuing comments on current E.A.]

General Comments & Germane References:

As an ecologist both familiar & concerned with the future of the returned North America native wild horses in the Big Summit Territory, I most favor Alternative 3. It is the only one that even comes close to being fair & legal. It’s AML assignment of 150 low to 200 high horses with a mean of 175, though not really adequate for long-term viability, at least is a step in the right direction. At the mean level there would be 25,434 acres divided by 175 = 145 acres per individual horse. A horse density in this amount in this region of higher rainfall & productivity than most more arid areas in the West where the wild horses live would not be excessive, especially given the horses’ positive contribution to & symbiotic mutualism in the ecosystem as their soil building, seed dispersal & other positives indicate. They actually enhance the life community & benefit other species including ruminant, cloven-hooved herbivores. (Check out these references for proofs:

https://www.researchgate.net/publication/239848265_Facilitation_between_Bovids_and_Equids_in_an_African_Savanna ;

<https://www.researchgate.net/publication/274006946> The Horse and Burro as Positively Contributing Returned Natives in North America

<https://www.researchgate.net/publication/318163234> Pleistocene megafaunal extinctions and the functional loss of long-distance seed-dispersal services ; <https://www.thesprucepets.com/horse-manure-facts-1887394> ; <https://www.horsetalk.co.nz/2017/09/25/evolution-wild-horses-cattle-effect-range-damage/> ; <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2781800/> ; <https://www.researchgate.net/publication/223007520> Horse dung germinable seed content in relation to plant species abundance diet composition and seed characteristics ; https://esc.rutgers.edu/fact_sheet/horses-and-manure/ ; <https://www.horsetalk.co.nz/2018/01/08/fire-grazing-wild-horses-better-cattle/> ; <https://www.horsetalk.co.nz/2017/11/20/wild-horses-wildfire-wildlife-ecological-imbalance/> ; <https://www.myoutdoorbuddy.com/articles/133925/what-is-the-value-of-an-american-wild-horse?.php> <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4503665/> ; <http://www.pleistocenepark.ru/en/> ; <https://awionline.org/content/wild-horses-native-north-american-wildlife> ; <https://www.livescience.com/9589-surprising-history-america-wild-horses.html> ; http://pennsylvaniaequinecouncil.org/SHCAC_green.php ; <http://advances.sciencemag.org/content/advances/1/4/e1400103.full.pdf> ;

I further recommend an expansion of the BST to include the original 1971 habitat where the wild horses have legal right & also through the setting up of Cooperative Agreements, as Sections 4 & 6 of the WFHBA allow, so that an even greater AML can be assigned given expanded habitat. This would involve ONF & USFS officials truly protecting the rights of the wild horses here rather than abandoning them.

P. 14: 2,500 individual horses is the recommended population level for true viability in the wild (Duncan, P. 1992. Zebras, Asses, and Horses: An Action Plan for the Conservation of Wild Equids. IUCN Species Survival Commission, Equid Specialist Group. Gland, Switzerland).

P. 15: This is an exaggeration aimed at discrediting the wild horses. It ignores the substantial positive contributions made by wild horses to ecosystems, e.g. feces greatly bolstering humus content of soils & major intact seed dispersible including many natives as well as water retention of soils thus enriched by horses leading to greater water stored in the earth, i.e. water tables/aquifers. (See above references.)

P. 16. Concerning competition between horses & livestock, your statement is superficial & lacks objective analysis of the greater list of factors operating in BST, including especially livestock.

P. 16. Social Values: This section downplays the great public values of the BST wild horses. For example, no surveys are presented where you objectively questioned visitors to BST about their views of & interactions with wild horses. From what I learned, they are a real positive attraction to the majority. Concerning Population Control Methods, I oppose the cruel, insensitive & unwise tampering with the horses' reproductive physiology as by PZP and GonaCon injection. PZP in particular produces serious short- & long-term consequences that jeopardize the survival of the horses by weakening their immune systems as well as causing social disruption & their extreme suffering & death (See <https://www.horsetalk.com.nz/2020/03/24/pzp-wild-horses-do-not-belong-together>.) I also object to any sterilizations of either sex. These are forms of domestication & contrary to the true spirit & intent of the WFHBA. I recommend your adoption of the sound principles of Reserve Design in order to establish: (a) a truly long-term, genetically & in other ways viable population; (b) a harmoniously eco-adapted wild horse population & (c) a naturally self-stabilizing population (see www.gofundme.com/mstngreservedesign for further details).

P. 18. Judicious forest thinning & mulching/composting of slash to recycle nutrients could increase available forage for the wild horses & work compatibly with locals to benefit both the wild horses & the economy. There should always be sufficient decomposition of native vegetation back into the soils to prevent the impoverishment of same that is so critical to most terrestrial ecosystem's long-term vitality.

P. 23. Alternative 2 is your Preferred. This is an outrageous abandonment of USFS duty under the WFHBA & several other laws that defend the rights of the wild horses & their viable & complete habitat requirements. By siding with the wild horses' enemies, you would be abandoning your legal duty to uphold all the laws fairly. Your proposal to lower the AML from the existing 55 to 65, mean 60, to merely 12 to 57, mean 35, horses abandons your legal duty & must not be adopted! Even the existing AML of 55 to 65 horses is a set up for inbreeding & decline of these wonderful wild horses. This would be criminal!

P. 25. The skewing of the natural sex ratio to 60% male to 40% female would create an unnatural social structure that would result in much more agonistic, or aggressive, behaviors between stallions, much more discontent among females & consequent abandonment of stallions & bands as well as a failure to educate the younger members of bands. This would impede/thwart the horses' harmonious adaptation to this particular ecosystem & be very much contrary to the true interpretation of the WFHBA as concerns the wild horses' principle rights to resources within their legal areas (Section 2 c of WFHBA). It would also be contrary to the WFHBA's mandate for USFS & BLM to achieve a true Thriving Natural Ecological Balance (TNEB, also covered under Section 2 c). WFHBA also mandates minimal interference with the wild horses; so obviously the "gutting" of the existing moderately populated BST herd (as would be dictated by Proposed Alternative 2) would not constitute "minimum feasible level" management, as per WFHBA's Section 3 a.

Pp. 24-28 & Table 2: Here you exaggerate the negative effects of the wild horses while ignoring their positive contributions. You should at least opt for Alternative 3 with its AML of 150 to 200 horses & take steps to secure more adequate resources for the wild horses by cutting back on livestock & curbing loggers, hunters, OHVs & other natural harmony disrupters dominating the scene. I recommend you employ Reserve Design in order to have a long-lasting-viable mustang population here, one that is allowed to harmoniously adapt to its surroundings & to fill its ancestral niche. This would enhance the ecosystem & result in a self-stabilizing mustang herd, provided the sound principles of Reserve Design are adhered to & faithfully & conscientiously implemented. Contrary to biased views, this optimistic future scenario is very possible for naturally living horses, but its realization depends upon we humans' willingness to pull in our horns & to learn to share the land & freedom. We must just give them a chance to prove how they can fit in & benefit all species, including ours.

P. 35. From the data you & others present over a number of years, the BST wild horse population is generally self-stabilizing. We should let the wild horses inform us as to what their "appropriate level" is, rather than arbitrarily dictate a population size that leaves their ecological niche largely unfilled. The latter only disrespects the horses & their justified place in the world of nature.

Pp. 35-36. ONF is overlooking various mortality factors including natural predation, first year mortality, disease-caused mortality & human-caused removal & mortality. My in field & document investigations indicate that the latter is quite major! (See <http://rtfitchauthor.com/2014/04/28/report-wild-horse-population-growth>.)

P. 38. Targeted tree thinning that respects the natural character of the BST ecosystem could considerably increase forage for wild horses & provide economic benefit to locals.

P. 39. Observing the strong & extensive fences at certain BST borders near where I camped & elsewhere, as well as inspecting on-ground evidence & interviewing people familiar with BST, including locals, lead

me to discern that considerable illegal capture & removal of the BST horses has & continues to occur – & that little is being done about this! The fences around the BST often have gaps in them that make it easy for people on quads to drive the horses outside their territory & then quietly herd them into corrals & latter into trailers to haul them off to an uncertain fate. Much more concerned & continuous vigilance of this herd throughout the BST is needed by authorities & cooperating wild horse defending volunteers!

P. 39. You state that the Wild Horse Winter Range is only 4,942 acres & use this as a convenient excuse to declare a woefully low AML of only 12 to 57, mean 35, horses. I see this as a ruse & clearly not based on the greater facts & an honest overall view of the BST ecosystem! Your claim that the horses are restricted to these 4,942 acres during winter is not supported by observations by those concerned citizens who have been monitoring this herd for many years, including the Central Oregon Wild Horse Coalition (COWHC). Furthermore, by bringing the herd to such an artificially low level, you would be setting it up for more probable extinction due to severe weather events, whether winter storms or summer droughts, diseases, illegal capture & killings, etc., many of which are linked to the increasing instability, elevating average temperatures & extreme oscillations caused by Global Climate Change.

P. 41. Genetic Health. According to Dr. Cothran's analysis & your own admission, the BST herd is below the critical level of heterogeneity (H_o) with results of 0.653 & 0.583. Any figure below 0.66 is at critical risk. Furthermore, this herd preserves Old World Iberian lineages of close relation to Andalusians. – This is a unique & valuable herd & you should be increasing its numbers to assure its long-term viability – not cutting it to the quick as you are proposing! Also, by reducing it to such a low level, you set back generations of valuable adaptations by these particular horses to this particular ecosystem & break up the family bands & inclusive herd structures, education of young by mature horses & the general harmony that these horses, in their ongoing struggle to survive, have been developing for many generations. This is unconscionable & reveals a basic disrespect for these wonderful horses & a siding with their traditional enemies. As well as the WFHBA law, also the National Historic Preservation Act should cause you to restore this herd to a much higher level & share of habitat, including year-round forage, water, shelter, adequate space for seasonal migrations, minerals, etc.

P. 34-42 & throughout document. Much of the data you present & the conclusions you draw from this seem lacking in depth & indicate a high degree of arbitrariness, as though you knew beforehand what conclusions you wished to draw. Basically, you target the naturally living horses & seek to reduce them to a mere token, highly interfered & controlled, artificially low population size. In effect this would domesticate these "wild" horses -- take away the very wild & free-roaming, natural lifestyle that the WFHBA mandates! And there is nothing "multiple use" about this, because in so doing you are, in fact, securing an even greater monopolization than already exists of the BST space & resources in order to appease livestock ranchers & to a lesser degree other resource exploiters. Your analysis of the BST situation is overly tendentious & lacks true objectivity & fairness to all interests concerned, especially that of the naturally living horses whose "wildness" is actually much more "civilized" & well-ordered than that of us really "wild" in the sense of "out-of-control" humans today! Finally, by bringing in outside horses to bolster genetic heterogeneity, you would adulterate the BST herd's special character & set back many generations of natural adaptation accomplished by this herd. Such a tremendous loss this would be! Let's learn to truly appreciate these marvelous horses & show them due respect! Surely, they are much more natural than "man-made".

P. 42. It seems you go out of your way to minimize the Winward Riparian data (Table 12), which shows an increase in young saplings here in the BST, then you bring in outside studies by Davis & Boyd 2018 & Beaver & Brussard 2000 to form your deprecative conclusions aimed at the wild horses.

P. 43. Table 12, Figure 21. Here you really overlook the obvious, because most objective observers would see the taking off of lower limbs by the wild horses, that your photo & assessment prove for the BST, as being a very valuable catastrophic-wildfire-preventive service. As you must realize, this is what fire prevention crews do: take off lower limbs of trees so that surface fires especially during hot dry seasons (when ground vegetation can easily be caused to ignite by lightning, camp fires, etc.) are less likely to “climb the ladder” of lower limbs & become major crowning fires. Since Global Warming is increasing the risk of catastrophic wildfire, your observations prove the tremendous value of having a much larger herd of wild horses here. In related fashion, the horses here are perfect reducers of large quantities of ground vegetation that later in the drier seasons become dry tinder. Horses are more suitable than most ruminant herbivores in this role, because their post-gastric, caecal digestive system contributes less decomposed feces to soils. And as a consequence, these droppings create more vital humus content in the soils. And humus makes them more nutrient rich & water-retaining, elevating water tables & causing the whole ecosystem to become more species-rich, robust, resilient & stable. (See above references p. 18.)

P. 44. Top paragraph seeks to understate & minimize wild horse protections by the WFHBA. It ignores its Section 2 c whereby the BST land & resources should be “devoted principally to the welfare and benefit” of the wild horses themselves, not the livestock ranchers, loggers, hunters, etc. Also, you violate the true spirit of fairness that is in the Multiple Use & Sustainability Act, NEPA, FLPMA, PRIA and, I believe, the very Endangered Species Act, which also covers rare populations such as that of the BST mustangs. Table 13. Inspecting this, it is apparent you are skewing data & particularly the interpretation of such in order to favor the ongoing livestock predominance & “justify” the minimization of the wild horses.

P. 45. Here you continue an unbalanced interpretation of data in order to blame wild horses & favor ranchers, etc. This is a “squeeze play” that is not at all fair.

Figure 22. Here you lump together wild horses, wildlife & livestock, rather than distinguish the separate effects & niches of each species. This leads to a sloppy assessment that trickily permits you to blame wild horses – your target – while not only continuing but increasing the status quo monopolization by the BST ranchers & their livestock &, to a lesser degree, the exploitive interests of loggers & big game hunters, chiefly.

P. 46. Yet the fact of the matter is that the naturally living horses actually complement ruminant herbivores, because they restore a more balanced ecosystem: enrich soils, disperse intact seeds of greater variety, open up thickets, create natural water catchments, etc. And they do this to a greater degree than is the case with most ruminants, including the sheep & cows who are brought in here & disallowed to harmoniously adapt & contribute to the ecosystem, for, indeed, they are quickly removed for human consumption. (Again, see references given on p. 18.) To merely lump the ungulate herbivore species present together & treat them as the same is dishonest or, at best, grossly oversimplified! Horses are different from cattle, sheep, deer, etc.; & they are needed here to restore balance in an ecosystem overrun by the many ruminant herbivores that people foist upon this ecosystem in unnatural numbers only to abruptly jerk them out for commercial consumption. This deprives the year-round species of major recycling components which becomes a serious drain on survival resources & a steady undermining of ecosystem integrity with the passage of time.

As an ecologist who has studied in depth the dwindling Order Perissodactyla of the Earth, including members of the horse family, Equidae & tapir family Tapiridae & rhino family Rhinocerotidae, I believe horses need to be rewilded in many places where they can heal imbalances caused by too many ruminant herbivores forced at unnatural levels & for too long upon the land. (See references, p. 18.)

-- As well as overlooking the wild horses' ecological services, I also feel you minimize the great Public Interest in the BST wild horses and make light of this great Quality of Life value.

P. 50. Effect on Herd Social Structure: Your devastating reduction of herd size would obliterate the horses' valuable social structure. This is the product of many generations; your violent roundups would set back the natural self-stabilization that occurs in mature wild horse bands (harem-type family groups) that typify horses in nature. Then to opt for PZP, cruel & dangerous sterilization of mares & stallions & the unnatural skewing of the sex ratio & age composition would cause more dysfunction & adversely affect these beleaguered horses ability to survive both in the short & long term. This would not be a Thriving Natural Ecological Balance as mandated by the law, but a non-thriving, unnatural, artificially imposed Imbalance for these wild horses & the ecosystem itself where these horses contribute positively, enhancing the life community. These mustangs & a truly wild-horse-containing & welcoming ecosystem should be your primary focus, not more livestock monopoly on these lands! Such injustice has already been committed on far too many of the wild horses' legal areas.

At least you should opt for Alternative 3 & allow an AML of 150 to 200 in the BST. For both the status quo Alternative 1 AML of 55 to 65 & the extreme Alternative 2 AML of 12 to 57 are thinly disguised lethal plans for the future of these unique & spirited mustangs. I look forward to revisiting them again in the near future. They are elegant & agile horses – a unique lineage – that is adapting harmoniously & in a positive way here in the forests & meadows of this charming mountain region. Furthermore, they are a great public attraction & source of knowledge & enjoyment; it would be such a shame for you to turn your back on & betray them!

I look forward to your professional response. Feel free to contact me with questions & concerns.

Sincerely,

Craig C. Downer, Wildlife Ecologist
Wild Horse and Burro Fund
P.O. Box 456
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cc: various interested parties.