

BLM Utah Resource Advisory Council
Conference Call Meeting Minutes
March 2, 2021

Meeting attendees

Utah Resource Advisory Council (RAC) members: Chad Baker, Joan Hayes, Callee Butcher, Clif Koontz, Jay Tanner, Rick Draney, Troy Forrest, Tom Adams, Ralph Bohn, Tyler Thompson, Bill Cox, Frank White, and Mike Worthen.

BLM employees: Greg Sheehan, Lola Bird, Rachel Wootton, Abbie Jossie, Evan Glenn, Kelly Orr, Gloria Tibbets, Lance Porter, Gus Warr, Pete Ross, Brad Washa, Harry Barber, Whit Bunting, Randy Beckstrand, David Hercher, Dan Gunn, and Jennifer Jones.

Members of the public: WS Lessig, Pam Turick, Peggy Kaszas, RaCail Hays, Ingrid Akerblom, Kay Kotzian, Mary Hone, Shauna Muztafago, Laura Peterson, Dallin Prisbrey, Mark Moehling, Karen Fuller, Susan Vaughn, Brieanah Schwartz, Neal Clark, Ximena Echeverria, Jennifer Rogers, Judy Boyle, Sandy Sharkey, Reid Persing, RJ Stein, Samantha Couper, CC Christie, Leslie Wasserman, and Suzanne Ballard.

Nominations for 2021 chairperson

Bill Cox nominated Troy Forrest to serve as chairperson for another year. Jay Tanner seconded the nomination. Troy is willing to serve another year. Jay Tanner moved that nominations close. Bill Cox seconded the motion. There were no dissenting votes on Troy serving another year.

BLM Utah Priorities

Presenter: Greg Sheehan, State Director

- The Utah Resource Advisory Council (RAC) call for nominations closed on Jan. 7. We are coordinating with the Governor's office to get concurrence on recommendations. Once the package is finalized, it will be advanced to BLM headquarters and then will go to the Department.
- There are three other advisory committees in Utah. The San Rafael Swell Recreation Area Advisory Council held their first meeting on Feb. 17. The Bears Ears National Monument and Grand Staircase-Escalante National Monument each have a committee. The Bears Ears National Monument Advisory Committee will meet on March 31.
- Utah received above average precipitation in February, but we are currently in a drought situation. Field offices sent letters to grazers that we may need to look at Animal Unit Months for this year due to the drought situation. We are hoping for more moisture this spring.
- 2020 was a busy fire season. There were many human-caused fires.
- 2020 was a huge year in recreation use. Addressing this increased use is a high priority for the BLM.
- Wild horses and burros – BLM Utah did a large number of wild horse gathers in 2020.

- Priorities: The new President and Administration came with their new set of priorities. Our agency will help implement and fulfill these new priorities.
- The following are the priorities of the new administration: addressing the Covid-19 crisis, racial injustice crisis, climate crisis, and building back better.
- State priorities: recreation – develop a proactive and adaptive strategy; Dingell Act implementation – land conveyances and exchanges; fire and fuels management – strategic plans for fuels management; energy and minerals – increase wind, solar, and geothermal energy; planning and National Environmental Policy Act (NEPA) – travel management plans (TMP), implementation of monument management plans, and the Environmental Impact Statement (EIS) for the Pine Valley Water Supply project.
- Secretarial order 3395 issued on Jan 21 pulled back some delegated authorities to the Department for 60 days.
- The new BLM Deputy Director for policy and programs is Nada Culver who replaced Perry Pendley.

RAC member discussion:

- Personnel and funding – how do decisions get made? There are many factors. We juggle as many balls as we can and try to work on as many different items as we can. We have dedicated staff who want to get things done as quickly as possible and focus on areas with specific timelines.

Statewide Resource Management Planning

Presenter: Abbie Jossie, Deputy State Director for Natural Resources

- Implementation plans tie to resource management plans (RMPs).
- The Cedar City Field Office RMP has been ongoing since 2010. The planning area is approximately 2.1 million acres in size. A Notice of Intent to prepare an EIS was published on Sept. 10, 2010.
- A Draft EIS was prepared, and the Department was briefed on April 10, 2020. The Department asked for additional review.
- The current draft is supported by Beaver and Iron Counties.
- Funding for the plan expired in Fiscal Year (FY) 2019. We are hoping to get funding to finish this planning process in the next couple of years.
- The next step for the Dingell Act plan amendments is public scoping. Plan amendments will be completed through Environmental Assessments (EA).
- RMP evaluations - there is a statewide review of RMPs focused on conformance to current fire management policy.

RAC member discussion:

- Is the RMP evaluation just for fire plans or all RMPs? It applies to language in all RMPs that exist today and how they cover fire management, in particular for fuels reduction or fire response.

- How are court actions impacting sage grouse? We are currently implementing the 2015 sage grouse plan amendment for Utah. The 2019 amendment was enjoined.
- For the Cedar City Field Office RMP, we have built in language to allow flexibility for implementation.

Travel Management Planning Overview and Current Status

Presenters: Evan Glenn, Travel and Transportation Program Lead; Kelly Orr, Branch Chief for Outdoor and Heritage Resources; and Abbie Jossie, Deputy State Director for Natural Resources

- Why do we manage routes? Provision of access and experience, maintain connectivity, provide certainty, reduce impacts, and it is required by law.
- Authority and guidance for travel management planning comes from Executive Orders and BLM manuals and handbooks.
- What is an off-highway vehicle (OHV)? Any motorized vehicle capable of, or designed for travel on or immediately over land, water, or other natural terrain. The most common OHV is a passenger vehicle.
- Steps in BLM travel management: OHV area designations, resource inventory, route-by-route evaluation and documentation, NEPA process resulting in a TMP, and implementation and update.
- OHV area designations: open, closed, or limited.
- Resource inventory: spatial data and maps, linear feature inventory, cultural resource inventory and survey, and public/stakeholder participation.
- Route-by-route evaluation and documentation: interdisciplinary team effort, each linear feature assessed on criteria, focus on identifying purpose and need for each linear feature, and results in a specific form for each route.
- NEPA process resulting in a TMP: TMPs are the primary implementation-level decision documents laying out the management of the BLM's travel network and transportation systems. It is generally an EA level NEPA document.
- The goal in Utah is to keep analysis at the EA level.
- The travel planning process is very dynamic. We can adjust our plans as needed.
- Implementation and update: on the ground work with partners, signage, work to open new routes and close or rehabilitate non-designated features, enforcement, and update travel plan via new NEPA actions.
- Travel management results in TMPs and maps, requires interdisciplinary and public participation, and is based on route connectivity, access, and experience and consideration of resource impacts.
- The travel planning process can require four to six years per project due to the multiple and complex steps required.
- BLM Utah is home to nearly half of the BLM's current travel planning contracts.
- The 2017 settlement agreement will result in 12 new TMPs by 2025. It involves Price, Vernal, Richfield, Moab, and Kanab Field Offices, settling litigation on the 2008 RMPs.
- The San Rafael Swell TMP was completed in 2020.
- The BLM is working diligently to meet deadlines for the TMPs.

- House Bill 179 makes closure of county A, B, C, or D roads and RS 2477 rights-of-ways, under certain conditions, a class C misdemeanor. We are working with county partners on it.

RAC member discussion:

- We are aware of only one TMP that couldn't be resolved at the EA level and required an EIS – the California Desert TMP.
- Inventory for RS 2477 – many RS 2477 routes are assertions that are not adjudicated yet, so a decision for travel planning is set down. TMPs are implementation-level documents and are dynamic so routes can be added or subtracted as needed.
- Interdisciplinary teams are made up of BLM resource professionals and partners who work on these plans. The public provides input during the public comment period.
- What is consequence if one plan is delayed? Additional plans will be delayed.
- We will meet the settlement agreement but may not meet all timeframes.
- What number or percentages of miles are documented? How can the public find the information? The information is laid out in a table in each EA showing each alternative.
- Is there a ballpark number of miles or percentage of potential routes vs. what ends up in the final plan? It varies from plan to plan.
- Where a route has a purpose and need, and is not highly sensitive or redundant, it usually gets carried forward.
- The BLM is working to provide a good system of routes.
- The BLM travel and transportation web page has a list of plans currently in progress. The plans can also be accessed on the BLM's ePlanning website.

Color Country District Project Planning

Presenter: Gloria Tibbetts, Planning and Environmental Coordinator

Northern Corridor Project

Summary of Decisions made on Jan. 13, 2021:

- BLM: Right-of-way grant issued based on Utah Department of Transportation alignment.
- BLM: Approved Red Cliffs National Conservation Area RMP amendments allowing the right-of-way.
- U.S. Fish and Wildlife Service: Incidental take permit issued based on Amended Habitat Conservation Plan for Washington County.
- BLM: Approved St. George Field Office RMP amendments modified management of BLM-administered lands in Red Cliffs Desert Reserve Zone 6.

The Incidental Take Permit:

- Continues the federal/state/local collaborative conservation approach for another 25 years.
- Allows for development throughout Washington County.
- Based on Washington County's Amended Habitat Conservation Plan.

- Contains Northern Corridor changed circumstance with additional conservation measures including the establishment of Zone 6.

St. George Field Office RMP Amendments:

- Emphasize protection of desert tortoise.
- Exclusion area for future rights-of-way.
- Prioritize acquisition of non-federal lands.
- Closed to solid and fluid mineral development.
- Allotments unavailable for grazing.
- Maximum trail mileage: four miles motorized and 35 miles non-motorized.
- Recreational closures including target shooting, dispersed camping, competitive motorized and equestrian special recreation permits, physical geocaches, and paintball activities.

Pine Valley Water Supply Project

Proposed Action:

- Develop approved water rights in Pine Valley for 15,000 afy.
- 15 groundwater production wells.
- Eight groundwater monitoring wells.
- 200-acre solar field.
- 12 miles of powerline.
- Nine miles of access roads.
- Underground storage tank.
- 66 miles of water pipeline.

Draft EIS Development:

- Addressing public scoping comments, including suggested alternatives.
- Refining analysis of groundwater and other resources.
- Continuing tribal consultation efforts.
- Coordinating closely with cooperating agencies.
- Developing mitigation for potential impacts to sage grouse, surface and ground water, and other resources.
- A 45-day comment period will take place in late spring or early summer.

RAC member discussion:

- Enforcement of closures will take place with BLM law enforcement and community awareness of closures. The county has additional funding for law enforcement.
- Zone 6 covers 6,812 acres; 3,471 acres are currently managed by the BLM.
- There is a lot of use in this area including mountain bike racers, hiking, and climbing. We are working on public outreach and education and getting appropriate signage to help with compliance and working to provide facilities to accommodate the high use.

- Demand is increasing. We don't want to see more damage due to the high demand and are working with partners to look at providing new facilities. This will cause a shift in use and looking at how to best manage that.
- The four miles of motorized and 35 miles of non-motorized routes applies to BLM lands. Routes could be added on Utah School and Institutional Trust Lands Administration lands. Non-motorized routes are capped at 65 miles.
- Current land acquisitions are not related to the Northern Corridor planning effort. Any lands acquired would be subject to the St. George Field Office RMP.
- For the Pine Valley project, the pipeline would be underground and the powerline would be above ground.

Dingell Act Implementation

Presenter: Lance Porter, Green River District Manager

- The Dingell Act included land designations, recreation area designations, land conveyances, and land exchanges.
- The BLM is working with many partners to implement the Dingell Act.
- The Ashley Springs land conveyance was completed on Aug. 10, 2020.
- The Hyde Park conveyance was completed on July 21, 2020.
- Contracts have been initiated for items relating to John Wesley Powell National Conservation Area, McCoy Flats Trail System, Jurassic National Monument, and wild and scenic river designations.
- Completed baseline inventories for grazing facilities and existing trails and routes for wilderness designations and installed portal signs.
- The San Rafael Swell Recreation Area Advisory Council (Council) held their first meeting on Feb. 17. The Council is working on a non-motorized trail study.
- Prepared a Notice of Intent to amend the Vernal, Price, and Moab RMPs.
- Invited 30 cooperating agencies and initiated memorandums of understanding.
- Land conveyances: Goblin Valley State Park, Emery City Recreation Area, Huntington Airport, Emery County Sheriff's Office, and Buckhorn Information Center.
- We will continue to coordinate with the Council and work on the six RMP amendments.

RAC member discussion:

- The Buckhorn Information Center and kiosk are on the way to the San Rafael Swell and Wedge Overlook. It is a great spot for people to stop and get information on how to recreate on public lands. People generally camp outside of the information center area.
- Jurassic National Monument is a small site. Hiking trails are being developed in the area to access the bone beds. We are working to upgrade kiosks and shade shelters and provide a play area for youth. There are dispersed camping opportunities right outside of the monument.

Wild Horse and Burro Program

Presenter: Gus Warr, Wild Horse and Burro Program Lead

- Wild horse and burro program goals: maintain healthy herds on healthy rangelands, ensure the health and welfare of animals in our care, and place excess animals into good homes.
- There are 177 herd management areas (HMA) on 26.9 million acres of BLM lands in 10 western states. Current population estimates include 95,114 animals on-range, and 54,217 animals in off-range holding facilities for a total of 122,561 total excess animals.
- The BLM has 28 short-term facilities which cost \$5/animal/day and 42 long-term pastures that cost \$2/animal/day.
- Gathers are conducted for planned population management, emergency conditions on the ground, and safety concerns.
- The number of animals treated with population growth suppression in FY 2020 is 735. In Utah, 254 animals were treated.
- Excess animals removed from the range are placed into private care through adoption, sale, or transfer. In FY 2020, 6,162 animals were placed into private care.
- The adoption incentive program offers \$1,000 to adopt an untrained wild horse or burro.
- Total program expenditures for FY 2020 were \$91,191,250.
- BLM Utah has 19 herd management areas and 10 herd areas.
- The BLM Utah wild horse and burro population estimate as of March 1, 2021 is 4,121: 3,672 wild horses and 449 wild burros.
- The BLM Utah appropriate management level (AML) for wild horses and burros is 1,956: 1,786 horses and 170 burros.
- BLM Utah received approval to remove 660 animals this summer in addition to the 510 already removed this FY.

RAC member discussion:

- Population growth suppression cost was \$326,739 – that is a sizeable cost per horse. It is a small compared to cost of lifetime care. Population growth suppression is only good for one to two years. 165 mares on the Onaqui HMA were darted this year.
- What is the IUD long-term prognosis? There have been 10 trial studies but no data on the range. If we can get three to five years, that will be good. We are still gathering data. 10 animals were treated with IUDs this year.
- Treating with IUDs is a simple process that is quick and non-intrusive. Some horse organizations are supportive and some are not. Spaying of mares is a concern with advocacy groups. BLM Utah has not implemented spaying.
- Is there an end in sight to the growing numbers of animals? What is the cost long term? The BLM submitted a report to congress proposing to gather approximately 20,000 animals per year over the next few years to reduce the numbers on the range.
- A rider on the appropriations bill makes it illegal to sell excess wild horses and burros for commercial purposes. The BLM does not see that changing.

- Future efforts to keep numbers down: the BLM is proposing six additional gathers in Utah for FY 2022 and hopefully get down to AML. The goal is to work to get down to AML and then keep the numbers at AML.

Great American Outdoors Act Update

Presenter: Pete Ross, Acting Deputy State Director for Support Services

- House Resolution 1957 was sponsored by Representative John Lewis and signed into effect on Aug. 4, 2020.
- The bill establishes the National Parks and Public Land Legacy Restoration Fund to support deferred maintenance projects on federal lands.
- Fifty percent of energy development revenues are created from oil, gas, coal, or alternative renewable energy development on federal lands, up to \$1.9B.
- Deferred maintenance is postponed maintenance activities/needs such as repairs on real property, in order to save costs, meet budget funding levels, or realign available budget.
- A policy of ongoing unresolved deferred maintenance often leads to even higher costs, asset failures, and health and safety issues.
- Maximizing the benefit of this unprecedented financial investment of taxpayer dollars will ultimately protect the public interest, address health and safety concerns, and protect our public assets.
- Capital improvements are new structures. Deferred maintenance cannot change the existing asset.
- Criteria for prioritizing projects: 35 percent for transportation and 65 percent for sites.
- Examples of deferred maintenance include roads, trails, campgrounds, recreation sites, and administrative sites.
- Utah submitted projects that were feasible and would rank well when compared to other states.
- Looking for ways to process projects efficiently.
- Land and Water Conservation Fund - there will be a steady stream of funding and support.

RAC member discussion:

- Each district establishes their priorities, shares them with the State Office, and then the projects are ranked and submitted to the headquarters office for funding. We apply funding received based on the priorities that were determined. Nationally, the BLM received five percent of the total funding.
- Are there Utah-specific projects that are a high priority? The evaluation process is still underway.
- Hoping for additional funding next year for deferred maintenance.

Fuels Management Update

Presenter: Brad Washa, Fuels Management Specialist

- Fuels Program vision: provide for resilient landscapes that reduce risk and negative impacts of wildfire on communities in a holistic approach through partnership collaboration while being adaptive to agency priorities.
- Cohesive Strategy: restoring and maintaining resilient landscapes, shared responsibility, and responding to wildfires.

BLM Utah fuels management highlights:

- Annual accomplishment - 111,327 acres.
- \$11,293,224 budget allocation - reduced from previous year.
- 78,799 acres completed during the pandemic.
- 27,660 more acres of fuels treatments occurred on BLM lands than burned in wildfires.
- 31 fuels treatment effectiveness intersections occurred.
- FY 2000-2020: allocation of \$202,223,794 and treatment of 1,274,869 acres.
- The Utah Watershed Restoration Initiative (WRI) and its many partners leverage funding for projects.
- FY 2002-2020 fuels treatments impacted by wildfire: 317 treatments.
- FY 2020 fuels treatment effectiveness: helped control 26 fires.
- In the last 20 years, there was only one year where more acres burned in wildfires than were treated with fuels treatments.
- BLM Utah and partners work to conduct landscape-scale fuels treatments.

RAC member discussion:

- How is Utah doing in comparison to other states in fire and fuels management? Utah is doing well compared to other states in respect to fire and fuels management.
- Appreciate what BLM Utah is doing with respect to fuels management on public lands.
- Does BLM do logging? BLM has done some logging in the past, but across the state, does not have much large timber. There is not currently a large market for it.
- Return on Investment – do we have cost savings data on benefits from these projects? We have done some studies that show economic impacts and savings as a result.
- Impact investment issues with helping third parties through public/private partnerships? The majority of our work is contracted. Is there funding from private parties? The WRI partnership leverages funding with groups for projects usually with a one to one match.

Draft Business Plan for the Kanab Field Office Campground Program

Presenter: Dan Gunn, Outdoor Recreation Planner

- The Kanab Field Office manages two campgrounds in Kane County – the White House and Ponderosa Grove Campgrounds.
- The Kanab Field Office in the Paria River District manages approximately 1,415,974 acres of public land in south-central Utah.

- There are nearly limitless opportunities for dispersed or backcountry camping in the Kanab Field Office where no fee is charged.
- Increases in visitation and campground use have occurred during the last decade.
- An important segment of recreation visitors want a formal campground experience with updated and maintained campground amenities and features. This segment expects to pay for these amenities along with services such as restroom cleaning and trash services.
- Kanab Field Office visitation in FY 2020 was 316,126.
- Ponderosa Grove Campground improvements – expanded from nine campsites to 36.
- White House Campground improvements – expanded from five walk-in sites to 12 sites.
- Improvements were recently made to address deferred maintenance needs and in response to trends of increasing public use.
- The proposed fee increase is necessary to align fee rates and operational costs with recent expansion and addition of amenities, improvements, and maintenance performed at each of the campgrounds.
- Proposed fee changes: increase the use fee at Ponderosa Grove and White House Campgrounds from \$5 per night to \$12 per night.
- Implement a use fee of \$50 per night for the Ponderosa Grove Campground group site with a maximum of 40 people.
- Fees at these two campgrounds have not been increased for a number of years.
- Benefits to the public from the fee increase and future upgrades: clean restroom facilities, Ponderosa group campsite reservations, scan and pay service, shade structures, and safety. We are considering a campground host program.
- Currently, the revenue from campground fees support only a fraction of the total operating costs.
- Ponderosa Grove Campground: annual operating cost is \$99,000 and the average annual revenue is \$4,800.
- White House Campground: annual operating cost is \$79,000 and the average annual revenue is \$8,200.
- The Kanab Field Office intends to use fees generated at each of the campgrounds to offset a greater percentage of costs associated with operation and maintenance of campgrounds.
- Looking for ways to augment funding to cover operation and maintenance costs of the campgrounds.
- Two public comments were received, and both were positive.
- Looked at fair market value in determining the proposed fees. Kanab Field Office feels that \$12 per night is a fair price.

RAC member discussion:

- What is the projected fee revenue? The Ponderosa Campground projected fee revenue with the fee increase would be \$77,145. Without the fee increase, it would be \$29,420.
- The White House Campground projected fee revenue with the fee increase would be \$23,330. Without the fee increase, it would be \$10,330.

- How many total sunshades will there be? The BLM is planning to provide shade shelters for all seven parking sites at the Whitehouse Campground.
- Glad to see that you are expanding opportunities in campgrounds and allowing visitors to pay electronically. The fees may actually be a bit low.
- This is a well-conceived plan. Fees may be on the low side.
- There is a lot of dispersed camping in the Ponderosa Campground area. In 2020, 2,987 people camped at the Ponderosa Campground and 2,120 people camped at the White House Campground.

Public Comment Period

- Brieanah Schwartz, policy counsel – American Wild Horse Campaign: AWHC has supporters nationwide – including in Utah – who care deeply about America’s public lands and our wild horses and burros. In fact, 2017 polling in District (UT-02) showed: 72 percent support the use of humane birth control as a means to manage wild horse and burro populations. AWHC is primarily concerned with three HMAs that we wanted to draw your attention to. First, despite the existing comprehensive PZP fertility control program in the Onaqui HMA, this herd is slated for a roundup in July. Instead, AWHC asks that the RAC encourage the BLM to forego this operation and allow the herd to stabilize with PZP instead. AWHC operates the largest humane management program for wild horses in the world by managing 3,000 mustangs on 300,000 acres of land in a cooperative with the state of Nevada. With a team of two dozen volunteers and budget of \$182,000, the program vaccinated more wild mares with fertility control than the BLM has, with its multi-million-dollar program budget. Fertility control is feasible and will work to stop population growth if used appropriately. It is also extremely cost-effective compared to roundups, removals and stockpiling. For example, in the first year of the program, AWHC prevented the birth of an estimated 690 new foals. In this case, the savings equates to roughly \$35,200,000. Second, the BLM implemented IUDs as fertility control in the Swasey HMA AWHC encourages the RAC to direct BLM to remain transparent with the public about how the IUDs are working in this herd, who they are working with, and any results. Third, though this issue is currently being litigated, the RAC should strongly encourage the BLM to abandon its plan to implement ovariectomy via colpotomy in the Confusion HMA as a management tool because it is counter to scientific recommendation for use on free-roaming species, inhumane, and counter to public opinion.
- Wendy Lessig: I am a volunteer with the Recreational Aviation Foundation and the Utah Back Country Pilots Association. I am a pilot with a passion for flying single engine planes and enjoy airstrips in the back country. Most of Utah’s back country airstrips are in the southeast part of the state. Pilots throughout the United States have a visit to Utah’s back country airstrips on their bucket list. Utah airstrips are hard to get to. They are essential for firefighting and emergency response. Be aware of this use. Aviation should be included as a use in the RMPs to preserve these unique and valuable resources.
- RJ Stein: I am looking at management tactics of the HMA from a numbers perspective based off of today’s presentation and would like to understand how much this is costing the taxpayers per horse. While I am certainly someone that advocates for the wild horses

and advocate to keeping them federally protected and wild. With that being said, I am a firm believer in PZP dosing as a use of herd management vs gathers as it is more humane for the animals, and it is SIGNIFICANTLY more cost effective than the current plan of gather and maintain. What is the cost breakdown per horse annually that it costs the public to gather and maintain the horses in off range corrals and paddocks? What is the average length of time that a horse is being maintained in your care? If only 60-70% of the gathered are being adopted/rescued annually or \$6162 in FY20 of the estimated 10,000 gather goal (Slide reference "Management"), then that seems a like a very high cost per animal which would only increase more as more horses are gathered. Does this cost also include the \$1000 per animal (Slide reference "Management") that is paid for the incentive program? Based off of Gus's comments of gather numbers to be doubled to around 20,000 horses, then is it safe to assume that this per horse cost number is going to continually rise as more and more horses are gathered? This is going to be extremely expensive if it is already costing \$56 million a year for the horses in holding now which is around 50,000 horses (Slide reference, Cost and By the Numbers). This looks to be around \$1120 a year per horse if you divide 50,000 horses into the \$56 million cost. What is the cost breakdown per PZP per horse? What is the estimated amount of mares that need this administered per herd to achieve impactful results? I would make the assumption that as the herd size decreases then the need for more doses wouldn't be necessary. I am not a scientist (and didn't see one on the call) but I would imagine that it would be a bell curve of cost as the ramp up period took place to PZP mares but would have long term savings. Even with the numbers quoted showing \$326k a year in the budget bucket for 735 horses, (Slide reference, By the Numbers and Management) it seems like it is costing only \$443 per horse, however, Gus specifically said in his presentation that that budget line item included vet costs on-site along with administration of the dose. Per Gus, he said "the actual cost of the PZP isn't very expensive" so \$443 could even be an over estimation. So it seems that the cost per horse is going to go down significantly if this is the management tool. I encourage the use of PZP for herd management versus gathering and maintain as it seems the most cost effective and humane way to manage the wild horse population. Please take this into consideration.

- Samantha Couper: Consider looking at fencing on public lands. In the Onaqui HMA, there have been fires and emergencies in the area. Fences have remained and they keep out wildlife and cattle. There are not enough people to remove the fences. Reach out to people to volunteer to take down these fences. Develop a policy and funding that when fences are installed, they can then be removed once they are no longer needed. Temporary fences are good, but they need to be removed once their purpose is complete.
- The public comments received via email from Karen Betten, Laurie Ford, Angela Murdock, Dallin Prsbrey, Laurel Samuels, and Amber Seely are attached. Comments received prior to the meeting were emailed to RAC members for review.

RAC Member Wrap-up Discussions

Draft Business Plan for the Kanab Field Office Campground Program

The Kanab Field Office proposes to increase the use fee at Ponderosa Grove and White House Campgrounds from \$5 per night to \$12 per night and implement a use fee of \$50 per night for the Ponderosa Grove Campground group site.

Tom Adams made a motion to approve the proposal as recommended to increase the use fee at Ponderosa Grove and White House Campgrounds from \$5 per night to \$12 per night and implement a use fee of \$50 per night for the Ponderosa Grove Campground group site. Ralph Bohn seconded the motion. The motion passed unanimously.

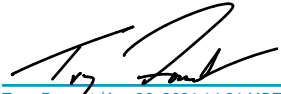
Category 1 - 4 yes, 0 no

Category 2 - 3 yes, 0 no

Category 3 - 5 yes, 0 no

Next meeting: The target date for the next RAC meeting is May 25, 2021 via Zoom.

Potential agenda items include dispersed camping issues, monument updates, business plans, back country air strips in RMPs, Great American Outdoors Act, update on annual passes for Fivemile Pass and other areas including LSRA, management of recreation in Zone 6, and High Desert Trail from Washington County to Tooele.

Approved: 
Troy Forrest (Apr 28, 2021 14:21 MDT)

Troy Forrest, Chairperson

[EXTERNAL] Utah RAC Meeting

Karen Betten <klbetten@pobox.com>

Mon 3/1/2021 8:45 PM

To: External_Affairs, BLM_UT <BLM_UT_External_Affairs@blm.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

To the BLM,

I wish to make an appeal to leave the wild horse of the Onaqui Herd alone. The herd was decimated in 2019 and the 400 horses that remain are living healthy lives in the wild.

- PZP can be used as a viable option to stabilize the herd population.
- Please partner with the wild horse advocacy groups to develop and secure a sustainable water source, especially now that there is a housing development along the HMA border.
- Please do not use helicopters!!
- Please honor the Federal Wild Horse Protection Act and stop the round ups only to cage the horses in miserable holding pens
- Be humane.

If you have spent any time with these horses, you know they are tight families with very deep bonds. They should be treated with respect and managed with care, not brutal roundups and end up in kill pens.

Tourist dollars are big business as well, and I'm AMAZED at how many people I meet every weekend that have traveled from out of state to spend time with the Onaqui. They are a national treasure and should be treated as such. There is NO REASON the thousands of acres of land on their HMA cannot support the members of the current herd. They are healthy and strong and can remain so. Leaving only 100 horses? That's beyond ridiculous!!!! Please do the right thing and leave the round ups out of the equation.

I understand BLM land is also used for livestock, however the need/greed for cheap livestock grazing should never override the range land for animals that are already present. Don't be a puppet to livestock organizations, please do an honorable job and manage the land with integrity for all its inhabitants, not just the special interest groups that back their need with dollars. The BLM should be a voice for those animals that don't have a voice of their own.

Thank you for your consideration.
Karen Betten

[EXTERNAL] Utah RAC Meeting March 2, 2021 comments by the public to be heard

Laurie Ford <laurieford505@yahoo.com>

Tue 3/2/2021 8:50 AM

To: External_Affairs, BLM_UT <BLM_UT_External_Affairs@blm.gov>

 1 attachments (19 KB)

Utah BLM Resource Advisory Council.docx;

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To: The Utah BLM Resource Advisory Council March 2nd, 2021

First off, I would like to comment on the scheduled 2021 Onaqui Mountain gather. If given the opportunity the Onaqui Mountain HMA could be a leading role model for humane and sustainable wild horse management. The combination of a successful and growing fertility control program, partnerships between the BLM and wild horse advocates, the existence of thriving eco-tourism, and a healthy relationship between ranchers, advocates, and BLM employees says it all. The horses do not interfere with other multiple uses of the land and there is enough forage to go around. This is not to mention the joy these animals bring to numerous groups, individuals of all ages, and entire families who are enamored with their presence.

People come from all over to enjoy these horses spending thousands along the way and in the nearby town of Tooele.

I would ask the BLM to continue working with advocacy groups to create a sustainable water source for the Onaqui Herd Management Area. Currently, there is a large development under construction on the border of the HMA and it is critically important that there be a sustainable water source for these horses.

The decision to remove 80% of the Onaqui wild horses is based on antiquated AML numbers that decades of GAO reports have proven to be flawed and not scientifically sound.

GAO reviewed the Bureau of Land Management's (BLM) efforts to: (1) manage wild horses on public rangeland in 10 western states; and (2) remove and dispose of excess wild horses under an adoption program.

GAO found that: (1) due to insufficient information, it could not determine how many horses ranges could support, the extent of degradation they caused, and the number of horses that should be removed from herd areas; (2) despite congressional direction, BLM did not base its removal of wild horses from federal rangeland on how many horses ranges could support; (3) BLM often did not accompany horse removals with a reduction in livestock grazing levels or effective range management, resulting in inhumane range

conditions and exploitation; (4) the number of wild horses BLM removed exceeded its adoption program's capacity; (5) BLM terminated the program in September 1988 after negative publicity and congressional pressure, but did not rescind the regulations authorizing such adoptions;(RANGELAND MANAGEMENT: Improvements Needed in Federal Wild Horse Program RCED-90-110: Published: Aug 20, 1990.)

GAO discussed the Bureau of Land Management's (BLM) wild horse program. GAO noted that: (1) BLM removed thousands of wild horses from the range each year without the land condition data that would enable it to determine how many horses the land could support and how many needed to be removed to meet this capacity; (2) the number of wild horses BLM removed exceeded its adoption program's capacity; (3) BLM was making its removal decisions on the basis of an interest in reaching perceived historic population levels or the recommendations of advisor groups largely composed of livestock permittees (PUBLIC LAND MANAGEMENT: Observations on Management of Federal Wild Horse ProgramT-RCED-91-71: Published: Jun 20, 1991. Publicly Released: Jun 20, 1991.)

In the December 2018 Onaqui Mountain Herd Management Area Population Control (Decision Record DOI-BLM-UT-W010-2017-0009), Alternative A, it states- *The BLM would continue to conduct monitoring activities in the HMA, including the monitoring of individual and herd health (including mares after fertility control vaccine treatments), genetic diversity (via hair sampling), population size (via flight and ground inventories), population growth rate assessments, and rangeland, wildlife habitat, and riparian conditions.* If such monitoring was conducted it would support that **a gather is not needed at this time.**

Jim Schnepel, founder and member of *The Wild Horses of America Foundation*, in coordination with the BLM herd manager has been darting mares since 2015 - a feasible task as the horses travel in very large groups and can be easily approached on foot or in a vehicle. Every year the numbers treated increases and the birth rate decreases. To keep the population stable at least 80% of the mares need to receive PZP and by 2020 150 mares were inoculated with primers and/or boosters. With an estimated current population of population 415, let's say half are mares of breeding age, the foundation is well on its way to stabilizing the population – it just takes time, and the required monitoring, to see the results!

By periodically only removing a small number of horses it can be done safely, and humanely, by bait and trap methods. Instead, the BLM prefers to pursue the archaic AML based helicopter gather and further alienate the overwhelming public who want the Onaqui horses to remain. As you know these horses travel in 3 or 4 very defined groups and this method of gather can easily decimate an entire group while leaving the others unable to survive as genetically viable herds.

In the 1977 GAO report on unauthorized livestock grazing a Nevada Bureau Director was quoted as admitting that *“such unauthorized use of public lands was the largest contributor to the State's deteriorated rangelands”*. Coming from a state with the largest wild horse population, he did not blame the wild horses and burros that are consistently scapegoated today. It is obvious that by validating the BLM's informal approach to unauthorized livestock grazing, which is not managing at all, will result in the same, if not more, attacks on our wild horses and burros and the land.

I also encourage the BLM to abandon plans for surgical sterilization of wild mares in the Confusion Herd Management Area and to pursue more humane methods such as PZP.

The idea of sterilizing any wild animal on the range is barbaric. For horses, the procedure is called an ovariectomy by colpotomy, where an incision is made in the mare's vagina, the ovaries blindly located by feel and then ripped out with an ecraseur – a rod-like instrument with a looped chain at the end. The same procedure performed on domestic horses calls for the mare to remain hospitalized for 3-7 days due to the risk of complications such as hemorrhaging, colic, and potential damage to other organs.

I also would like to ask the BLM to be transparent with the public about the use of IUDs and any subsequent research findings on mares in the Swasey Herd Management Area

Scientific based plans to implement humane, sustainable on-range management have been made available to the BLM for years from the Humane Society, the ASPCA, the American Mustang Foundation Return to Freedom and other prominent organizations. These plans are repeated disregarded, much like the 1-million-dollar study that the BLM paid the National Academy of Science Resource Council to conduct in 2013. The study recommended increasing the use of fertility control and abstaining from conducting sterilization in the field. That same year the BLM administered fertility control to a mere 509 mares, 384 the following year, and since then an average of 500 per year. Meanwhile, private citizens, in coordination with the BLM, continued with their own fertility control programs to curtail population growth and keep foal rates down to less than 10%, These ongoing efforts result in fewer removals and saving the taxpayers millions of dollars. This is what the overwhelming majority of US citizens desire.

Laurie Ford

Glenwood, NM

[EXTERNAL] Public Comment for 3/2/21 Resource Advisory Council

Angela Murdock <angmurdock@gmail.com>

Mon 3/1/2021 9:00 PM

To: External_Affairs, BLM_UT <BLM_UT_External_Affairs@blm.gov>

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Hello,

I cannot attend the meeting tomorrow and would like to be able to contribute to the public comment specifically regarding the wild horse discussion.

1. In regards to the discussion on the Confusion Herd Management Area I would like to see the most humane methods used for birth control. PZP at this time is the most humane method available, please consider this method over surgical sterilization.
2. In regards to the Swasey Herd Management Area and the use of IUDs. I would ask that the BLM be completely transparent with the use of IUDs and also any subsequent information or research resulting from their use.
3. The Onaqui herd is in need of a sustainable water source. I would encourage the BLM to work with preservation and advocacy groups to secure a sustainable water source. I have personally visited the Onaqui during the summer where I could not see a fresh or clean water source for the horses. Given there is a large development going in on the edge of the HMA I think the horses need this now more than ever.

Thank you for accepting my comments.

Angela Murdock

801-259-6231

Utah resident

[EXTERNAL] Utah RAC Meeting

Dallin Prisbrey <dallin33@hawaii.edu>

Sun 2/28/2021 6:54 PM

To: External_Affairs, BLM_UT <BLM_UT_External_Affairs@blm.gov>

 1 attachments (439 KB)

Utah RAC testimony.pdf;

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Please find attached my written comments for the BLM's March 2, 2021 Utah RAC meeting. Thank you.

February 28, 2021

Utah RAC
BLM Utah State Office
440 West 200 South, Suite 500
Salt Lake City, Utah 84101
BLM_UT_External_Affairs@blm.gov

Re: Utah RAC meeting written comments

To whom it may concern:

My name is Dallin Prisbrey, and I am writing to provide written comments prior to the Utah RAC meeting scheduled for March 2, 2021; specifically, I would like to provide written comments on the efforts of the BLM's Wild Horse and Burro Program in Iron, Beaver, and Millard counties. I am currently a law student at the University of Hawai'i at Mānoa William S. Richardson School of Law. I am a sixth-generation resident of Southern Utah, and I have lived in Enterprise, Utah for the past 10 years.¹

Introduction

Having grown up in Southern Utah, I have spent countless days outdoors with family and friends camping, hiking, off-roading, hunting, and fishing. Much of my time has been spent north of Enterprise around Hamblin Valley, Indian Peaks, and the Wah Wahs; while the BLM seems to divide this area between the Cedar City and Fillmore field offices, the Utah Division of Wildlife Resources ("DWR") has treated the westernmost parts of Iron, Beaver, and Millard counties as a single "Southwest Desert" unit for managing big game.² Based on my own experience on the Southwest Desert unit, starting around 2014, it seemed that every year the elk population was decreasing while the wild horse population was increasing. While obtaining an undergraduate degree in statistics and economics, I was able to put my personal observations to a more rigorous test. In 2019, I completed a study based on data from the DWR and BLM which provided evidence supporting my own experience that seemed to suggest that wild horses were having a negative impact on native elk populations.

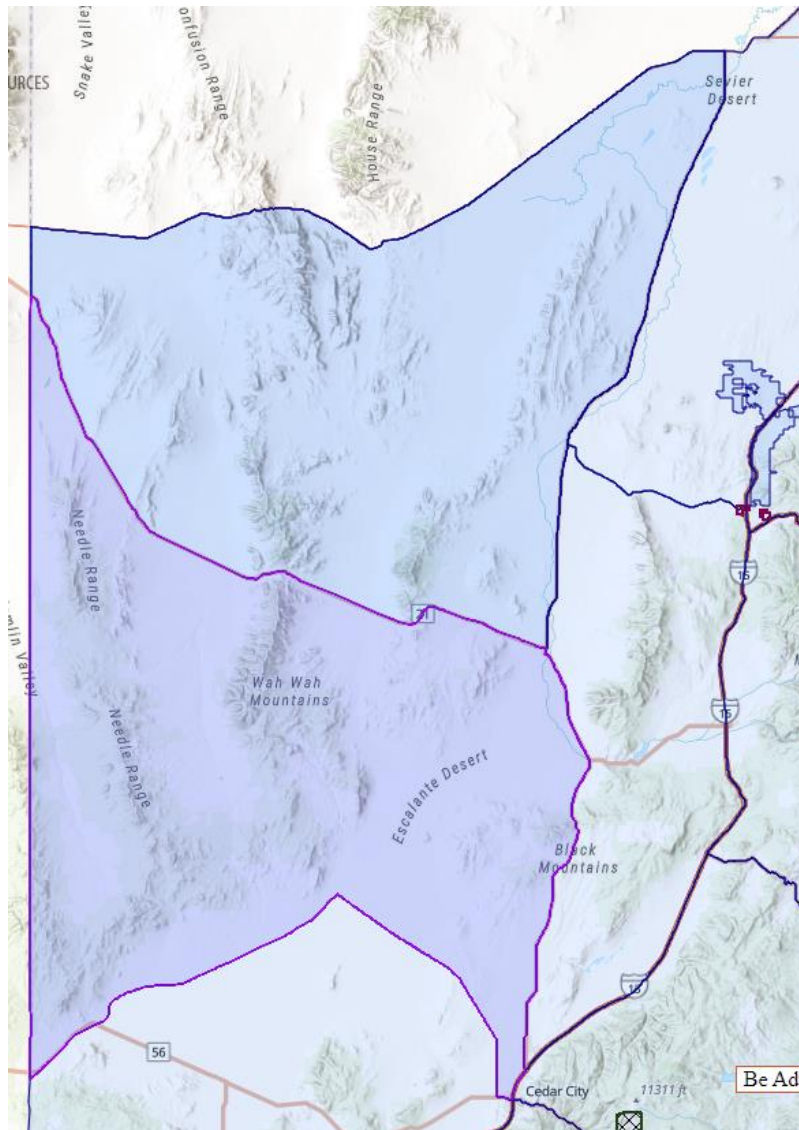
In the past two years, I believe evidence of a negative relationship between the elk population and horse population, at current levels, has grown even stronger. I do not believe it was a coincidence that in 2018 the elk population increased by 25% after two consecutive years of the wild horse population decreasing by around 5%. However, the wild horse population on the Horse Management Areas ("HMA"s) within the Southwest Desert are again on the rise, with the 2020 count swelling to over 2000 animals. If this trend continues, the consequences for Southwest Utah's premier elk population may be dire.

Argument

¹ While not away attending school.

² Although it seems that they have recently split the Southwest Desert unit into north and south for elk hunting.

As defined³ by the Utah DWR, the Southwest Desert unit comprises the westernmost parts of Iron, Beaver, and Millard. The Southwest Desert elk unit overlaps eight HMAs administered by the BLM,⁴ and one Herd Area (HA) that is not managed for horses.⁵ Approximately 78% of the land area in the Southwest Desert unit is managed by the BLM.⁶



Map 1: Southwest Desert Unit

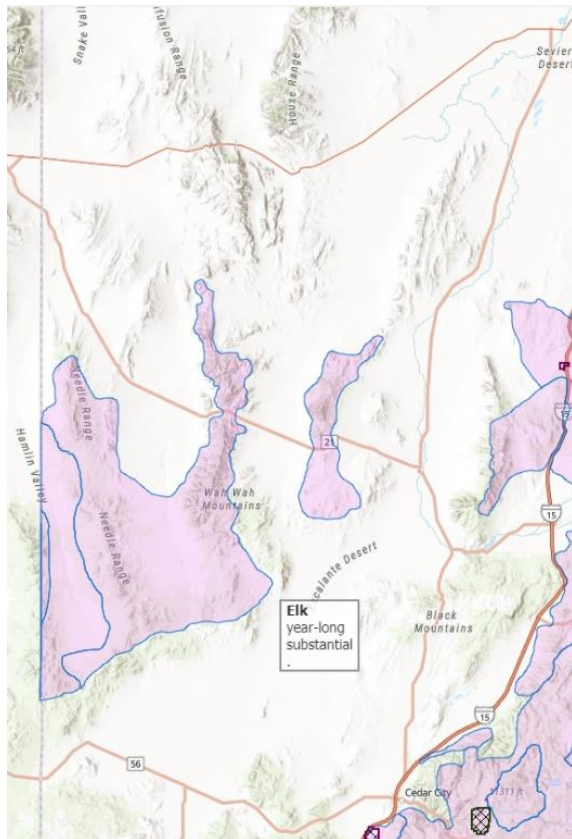
³ Boundary begins at the Utah-Nevada state line and US-6/50; east on US-6/50 to SR-257; south on SR-257 to SR-21; south on SR-21 to SR-130; south on SR-130 to I-15; south on I-15 to SR-56; west on SR-56 to the Lund highway; northwest on this highway to Lund and the Union Pacific railroad tracks; southwest along these tracks to the Utah-Nevada state line; north on this state line to US-6/50.

⁴ Bible Springs, Choke Cherry, Four Mile, Frisco, Kingstop, Mount Elinor, Sulphur, and Tilly Creek.

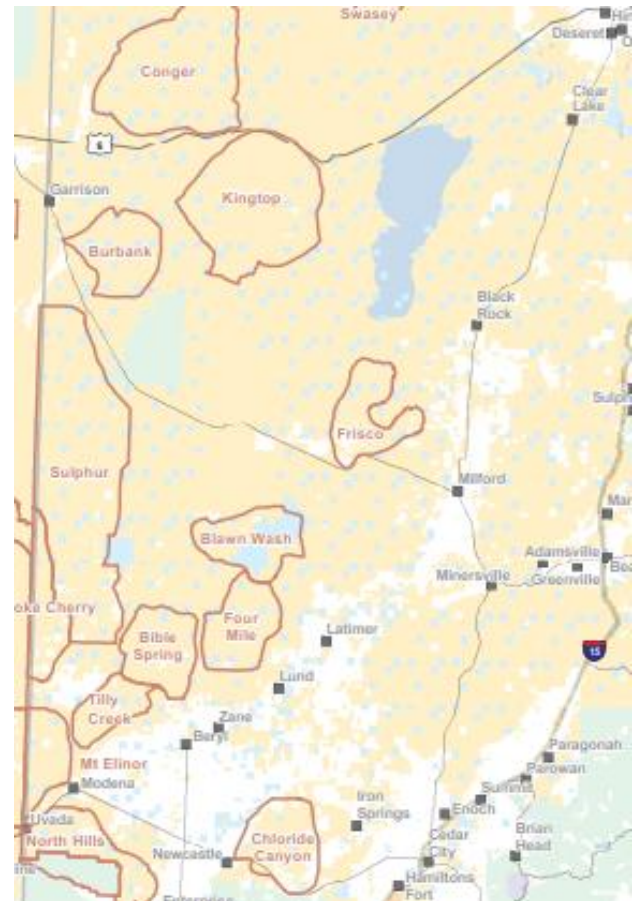
⁵ Blawn Wash.

⁶ Utah DWR. Elk Herd Unit # 20. Aug. 2016. https://wildlife.utah.gov/pdf/bg/plans/elk_20.pdf

I have attempted to quantify the effects of the wild horse populations on native elk herds in Southwestern Utah, where there is large overlap between horse and elk range. Data was utilized from 3 main sources: horse populations from tables published by the BLM,⁷ elk population estimates and harvest totals published in big game reports by the Utah DWR,⁸ and weather data from the National Weather Service.⁹ The time period spans from 2005 to 2019.¹⁰



Map 3: Elk Habitat (source: Utah DWR)



Map 2: HMAs (source: BLM)

To analyze the relationship between horse and elk populations, I utilized a multiple linear regression time-series framework. The elk¹¹ and horse populations over time are illustrated below in *Figure 1*, along with the number of elk harvested annually. I have also included an estimate for the 2020 elk population, which will likely not be released by the DWR until 2022, based on the number of horses, weather, and harvest.

⁷ <https://www.blm.gov/programs/wild-horse-and-burro/about-the-program/program-data>

⁸ <https://wildlife.utah.gov/hunting/main-hunting-page/big-game/annual-reports.html>

⁹ <https://w2.weather.gov/climate/xmacis.php?wfo=lkn> and <https://w2.weather.gov/climate/xmacis.php?wfo=slc>

¹⁰ The most recent elk population estimates published by the DWR end with winter 2019.

¹¹ The elk population numbers are for the winter ending in the specified year (2005 is the winter months of 2004-05).

Southwest Desert

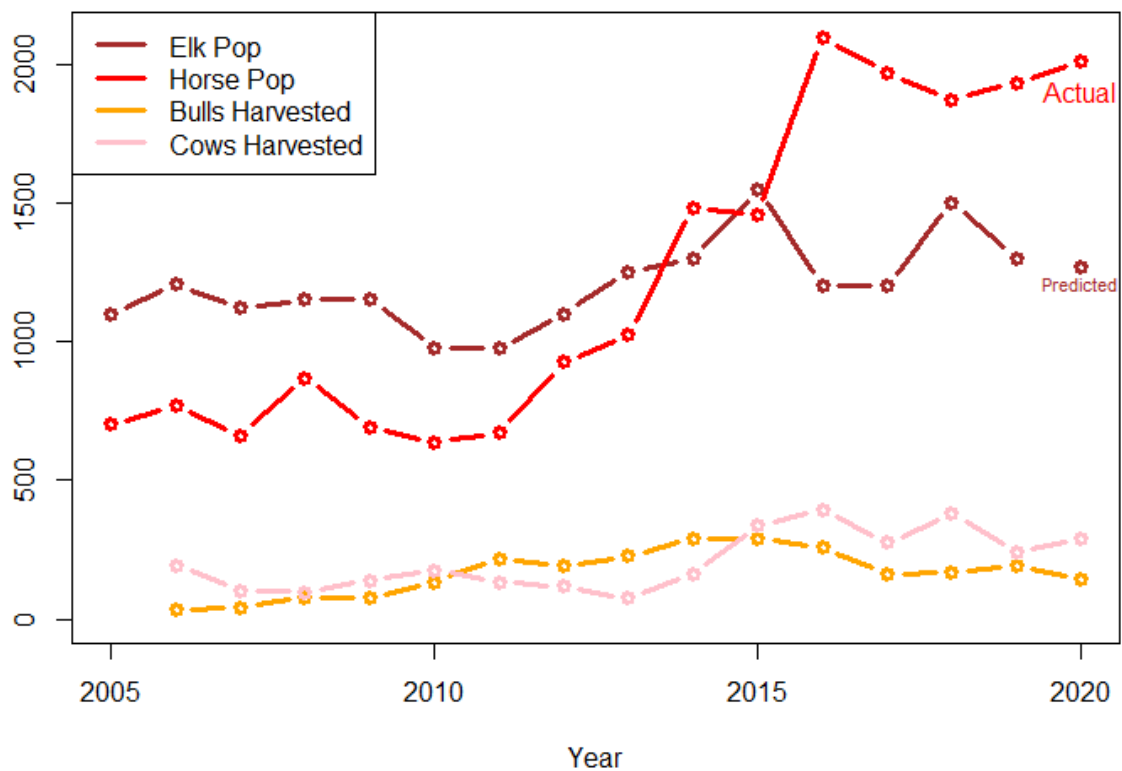


Figure 1

The main determinants of elk mortality are carnivores,¹² harvest, weather, and forage availability¹³—I attempted to control for each to isolate the effect of competition from the horse population for forage and water. Weather data was compiled from the National Weather Service, using the nearest weather station at Great Basin National Park in Nevada.¹⁴ Mean average temperature for the winter months of December, January, and February as well as maximum snow depth (as measured in feet) are included to control for the weather factors that would likely affect elk mortality. To control for perhaps the biggest determinant of elk mortality, the total number of elk harvested in the previous hunting season are included to control for human effects. If one plots the relationship between the horse and elk populations in each year, as in *Figure 2*, it appears to be non-linear—in other words, while both populations seem to increase together, there is an inflection point where the growing horse population has a negative relationship with the number of elk—so my model incorporates a quadratic term to capture this effect. Proper

¹² Brodie et al. have found that elk mortality was unrelated to the presence of mountain lions, and as SW Utah is devoid of wolves, it seems unlikely that predation has an effect in this case. Brodie, J. et al. *Relative Influence of Human Harvest, Carnivores, and Weather on Adult Female Elk Survival across Western North America*. Applied Ecology. Volume 50, Issue 2, April 2013, pp. 295-305.

¹³ Brodie et al. 2013.

¹⁴ While in a different state, this station is closer in distance and elevation to the SW Desert unit than stations in Cedar City and Fillmore. For the 2020 prediction, Fillmore’s temperature was used due to missing data from the Great Basin weather station.

statistical techniques were utilized to account for potential unequal variance and the passage of time.¹⁵

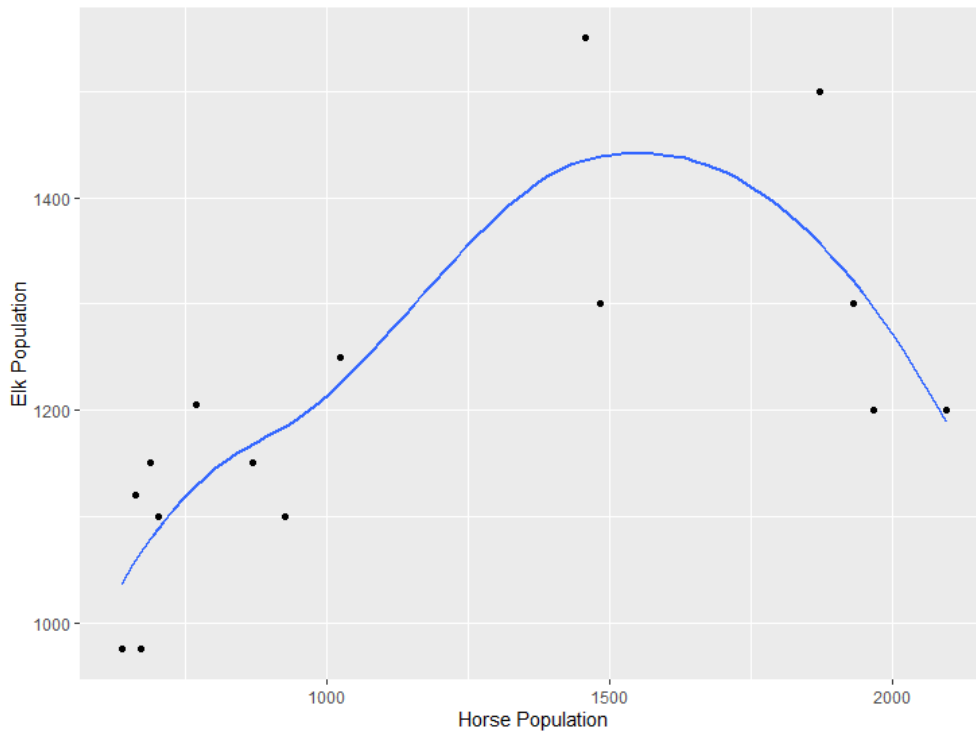


Figure 2

	Estimate	SE	t	P value	95% CI	
Horse Pop	1.7544	0.381	4.6047	0.0025**	0.8535	2.6553
Horse Pop Squared	-0.0006	0.0002	-4.0879	0.0046**	-0.001	-0.0003
Snow Depth	-1.4205	6.4394	-0.2206	0.8317	-16.6473	13.8063
Winter Temp	15.3505	13.4386	1.1423	0.2909	-16.4267	47.1277
Bulls Harvested	-0.5595	0.3025	-1.8496	0.1068	-1.2747	0.1558
Cows Harvested	0.6712	0.431	1.5573	0.1633	-0.348	1.6904

Signif. codes: ‘**’ 0.01 ‘*’ 0.05

Table 1

The model seems to support what is observed in the raw data, that the effect of the horse population on the elk population is non-linear. Initially, elk and horse numbers increase at a commensurate rate, but eventually the horse population seems to reach an inflection point where the increased herd size begins to have a negative impact on the elk population. This seems to make intuitive sense; the factors that are conducive to growing elk populations —such as mild winters, increased water during the summer, or better feed—are also conducive to the growth of

¹⁵ Specifically, Newey-West heteroskedasticity and autocorrelation consistent (HAC) standard errors were used.

horse populations. The positive relationship for the linear horse population term supports the BLM’s practice of targeting of Appropriate Management Levels (“AML”s) for feral horses; there exists a range of herd size for which horses can thrive along with native wildlife. Horses and elk can co-exist in the same habitat– to a point. It also seems that past a certain threshold, the horse population begins to crowd out the native elk population. While one must be careful in making causal inferences, this result is consistent with the ecological theory of ‘carrying capacity,’ wherein an ecosystem is limited in the amount of life it can support by the forage, water, and cover available.¹⁶ When there are excess resources, both elk and horse populations have room to grow unconstrained; however, there reaches a point where they begin competing over limited resources. This result could perhaps be explained in part by the findings of one study that concluded, “Feral horses exhibited dominant behavior over native elk during the driest time of the year (May–June), often preventing acquisition of water by elk.”¹⁷ The crowding out effect that is observed may further be explained by the findings of Scasta et al., that feral horses compete with elk for feed in the spring, fall, and winter.¹⁸ It should be noted that while horses are competitive and consume resources that increase the mortality of native wildlife, any fear that truly drastic or draconian measures need to be taken to preserve native wildlife should be somewhat allayed. Estimated coefficients and 95% confidence intervals are reported in *Table 1*. Using the model, it is also possible to estimate the threshold where the growing horse population begins to crowd out elk. Assuming average winter temperatures, snowfall, and harvests, this threshold appears to be around 1400 head of horses. This estimated relationship is presented in below in figure 3.

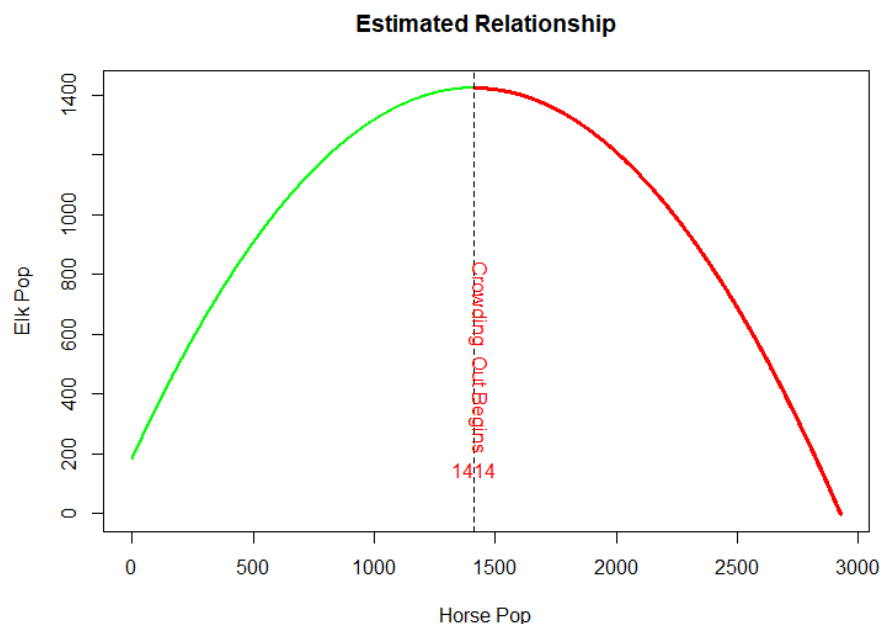


Figure 3

¹⁶ Hobbs, NT., and Swift, DM. *Estimates of Habitat Carrying Capacity Incorporating Explicit Nutritional Constraints*. The Journal of Wildlife Management. Vol. 49, No. 3, Jul. 1985, pp. 814-822.

¹⁷ Perry et al. "Dominance of a Natural Water Source by Feral Horses," The Southwestern Naturalist 60(4), 1 Dec. 2015.

¹⁸ Scasta et al. "Meta-Analysis of Diet Composition and Potential Conflict of Wild Horses with Livestock and Wild Ungulates on Western Rangelands of North America," Rangeland Ecology and Management 69(4), 1 July 2016.

Conclusion

Of the nearly 5000 wild horses in the state of Utah, over 40% are extant within the boundaries of the Southwest Desert elk unit. While less than 2% of Utah's elk population resides within the Southwest Desert, the Southwest Desert herd has great regional significance to the Southwestern corner of the state. According to DWR estimates, the Southwest Desert supports over 80% of the elk population that lives on the nearly eight million acres of Washington, Iron, Beaver, and Millard counties that lie west of I-15.¹⁹ If one extreme view prevails and horse populations are allowed to grow unrestrained, elk will be extirpated from 1/5 of the state. This is to say nothing of the effects that horses are having on other ungulates such as mule deer and pronghorn. If the other extreme view prevails and all wild horses are (somehow, however unlikely) removed, the number of free wild horses in the state will be cut nearly in half. If both of these propositions seem untenable, a balance must be found. There are real stakes to the management of both of these iconic animals, and unless both sides acknowledge the tradeoffs involved, little progress can be made.

It can hardly be argued that for the better part of the last decade any sort of balance has been found between the wild horse population and elk on the Southwest Desert. In 2013, the *Washington Post* ran a story with the headline, "The West is on the brink of a wild horse apocalypse." Since that time, the horse population on the Southwest Desert has increased by 96%. Elk and horses can coexist in the same environment, but when resources become scarce, the more aggressive wild horses will begin to take the place of native elk. It is my belief that the horse population on the nine HAs within the Southwest Desert unit needs to be reduced in the aggregate to around 1,400 head at a maximum, if the goal is for horses to not be a cause of elk mortality. This number is still more than double the aggregate high AML across the nine HAs, but it is likely more achievable in the short term and will help to ameliorate the most harmful effects.

In 1898, Utah's elk herd was "limited to a few animals on the north slope of the Uinta Mountains,"²⁰ but in the past 120 years, conservation efforts have brought them back from the brink. If actions are not taken to curb the exploding wild horse population, history may repeat itself, and elk may begin to be extirpated from the habitat where they have been successfully reintroduced. Whatever the solution, there will be those that are opposed to it—whether it be ranchers to reducing the number of livestock grassing on land where horse and elk habitat overlap, hunters opposed to the reintroduction of predators, environmentalists opposed to roundups and contraceptive vaccines, or the state of Utah to returning former reservation lands to the Indian Peaks Band of Paiute Indians²¹. Regardless of opposition, a wholistic approach needs to be taken so that the Southwest Desert can continue to support two of Southern Utah's most iconic species. All potential avenues should be explored, including re-evaluating grazing allotments that intersect with HMAs and elk habitat; potentially increasing the cougar

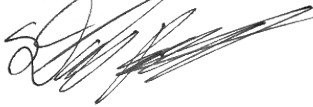
¹⁹ Based on the elk management plans for units 20, 21, 22, and 30 available at <https://wildlife.utah.gov/elk-plans.html>

²⁰ https://www.uen.org/utah_history_encyclopedia/w/WILDLIFE_MANAGEMENT.shtml#:~:text=Both%20elk%20and%20pronghorn%20were,other%20species%20were%20also%20exploited.

²¹ The Indian Peaks band was federally recognized on August 2, 1915 by Executive Order no. 2229. In Southern Paiute the band is known as *Kwee'choovunt*. <https://www.utahpaiutes.org/bands/>

population, because they serve as a natural check on horse populations²² without significantly affecting elk mortality; continuing roundups in the least harmful way possible, especially in the Blawn Wash HA where a horse population is not a management goal; working with locals to explore vaccinating horses through darting; and working with other agencies within the Interior Department and with the executive branch at large to address historic injustices suffered by indigenous peoples, like the Indian Peaks Band of the Paiute Indian Tribe²³, during the “termination” period, and empower tribal governments in their conservation efforts.

Sincerely,



Dallin Prisbrey

Enclosure

²² <https://www.nytimes.com/2018/05/12/sunday-review/let-mountain-lions-eat-horses.html>

²³ See Holt, Ronald L. *Beneath These Red Cliffs: An Ethnohistory of the Utah Paiutes*. pp.61-97, <https://www.jstor.org/stable/j.ctt4cgptt>

Data

year	elk.pop	horse.pop	snow.depth	wint.temp	bull	cow
2005	1100	702	17	31.26667	34	195
2006	1205	769	16	31.66667	44	102
2007	1120	662	14	28.53333	78	98
2008	1150	870	18	26.1	78	141
2009	1150	689	24	31	135	177
2010	975	637	22	27.23333	216	135
2011	975	672	21	28.86667	190	119
2012	1100	925	15	29.66667	228	75
2013	1250	1023	19	27.16667	290	162
2014	1300	1482	28	32.03333	289	337
2015	1550	1457	16	34.93333	260	393
2016	1200	2094	24	30.06667	162	275
2017	1200	1967	15	29.03333	167	379
2018	1500	1871	16	32.9	195	239
2019	1300	1930	17	29.86666	142	290
2020	NA	2010	18	30.6	89	NA

[EXTERNAL] Utah RAC Meeting

laurelsamuels <laurelsamuels@ymail.com>

Thu 2/25/2021 2:19 PM

To: External_Affairs, BLM_UT <BLM_UT_External_Affairs@blm.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

To Whom it May Concern,

In regard to your upcoming meeting, I am asking/ urging the following actions:

1. Abandon the plan to surgically sterilize wild mares and instead, implement a more humane fertility control program utilizing PZP in all areas/ herds. Surgical sterilization is inhumane, extremely costly and detrimental to the horse's/ pack's well being.
2. Be transparent with the public about the use of IUDs on mares in the Swasey Herd Mgmt Area. Including, but not limited to, what tracking and studies are being done by the BLM.
3. Work with wild horse preservation & advocacy groups to develop & secure a sustainable water source for the wild horses in the Onaqui Herd Mgmt Area, especially where there's now a large development under construction on the border of this area.

Respectfully,

Laurel Samuels

Sent from my Verizon, Samsung Galaxy smartphone

[EXTERNAL] Utah RAC meeting

Amber Seely <aseely31@yahoo.com>

Sun 2/28/2021 5:41 PM

To: External_Affairs, BLM_UT <BLM_UT_External_Affairs@blm.gov>

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To whom it may concern,

I am writing you to ask you to please abandon plans for surgical sterilization of wild mares in the Confusion Herd Management Area and to pursue more humane methods such as PZP. Also, please be transparent with the public about the use of IUDs and any subsequent research findings on mares in the Swasey Herd Management Area. Please work with advocacy groups to create a sustainable water source for the Onaqui Herd Management Area. At this time there is a large development under construction on the border of the HMA and it is critically important that there be a sustainable water source for these horses.

Sincerely,
Amber Seely
Salt Lake City, UT

[Sent from Yahoo Mail for iPhone](#)