

Northeast Nevada Wild Horse Eco-Sanctuary

Resource Management Plan Amendment
and Environmental Impact Statement



Scoping Summary Report

December 2012



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ACRONYMS AND ABBREVIATIONS

Full Phrase

BLM	United States Department of the Interior, Bureau of Land Management
CFR	Code of Federal Regulations
Eco-Sanctuary	Northeast Nevada Wild Horse Eco-Sanctuary
EIS	environmental impact statement
FLPMA	Federal Land Policy and Management Act
HMA	herd management area
NEPA	National Environmental Policy Act
NOI	Notice of Intent
RAC	Resource Advisory Council
RMP	resource management plan
US	United States
WFO	Wells Field Office

EXECUTIVE SUMMARY

The United States Department of the Interior, Bureau of Land Management (BLM) is preparing an environmental impact statement (EIS) to satisfy National Environmental Policy Act of 1969 (Public Law 91-190) (NEPA) requirements for a joint public-private Wild Horse Partnership and Eco-Sanctuary on BLM-administered and private lands. As required by NEPA, the EIS for the proposed Eco-Sanctuary will analyze a range of alternatives that may include land use planning actions as well as implementation actions such as a comprehensive management plan for the proposed Eco-Sanctuary. At the end of the EIS process, the BLM will select one of the alternatives for implementation, which will result in a resource management plan (RMP) amendment to the WFO RMP.

The planning area is the proposed Eco-Sanctuary area, which encompasses approximately 17,000 acres of private land and 508,000 acres of public land within the boundaries of the current Spruce Grazing Allotment. The private land within the planning area will not be subject to decisions made in the RMP amendment/EIS.

Public involvement is a vital and legally required component of both the RMP amendment and EIS processes. Public involvement for the Northeast Nevada Wild Horse Eco-Sanctuary RMP Amendment/EIS includes public scoping and outreach; collaboration with federal, state, local, and tribal governments and Resource Advisory Councils; and public review of and comment on the Draft RMP Amendment/EIS. This report documents the results of the public and agency scoping and outreach process.

PUBLIC SCOPING ACTIVITIES

Public outreach during the public scoping period has included: 1) a press release announcing the scoping period for the RMP amendment/EIS process; 2) an interested public letter mailed in August 2012 to 66 agency officials, organizations, and members of the public; 3) three open houses throughout

Nevada; and 4) a project website, http://www.blm.gov/nv/st/en/fo/elko_field_office/blm_information/nepa/nenvwh_ecosanctuary.html, which provides access to background material and maps of the planning area. The formal public comment period as required by NEPA began on August 15, 2012, with the publication of a Notice of Intent in the Federal Register and ended on September 19, 2012.

PUBLIC SCOPING RESULTS

During the public scoping period, the BLM received 205 unique written submissions. In addition, 3,638 form letters were received. Some commenters submitting form letters added substantive unique comments to the form letter. These comments were added to the comments from unique written submissions for a total of 862 unique comments. Comments were categorized, coded, entered into a database, tallied, and analyzed. Categories included process categories, planning issues, and commenter affiliation.

A total of 168 members of the general public (83 percent of commenters) provided written submissions during the scoping period, 27 organizations or non-profit groups (13 percent of commenters) submitted comments, and 4 businesses (2 percent of commenters) submitted comments. No federal agencies provided comments, though 1 state agency (less than 1 percent of commenters) submitted comments and 2 local governmental agencies (1 percent of commenters) submitted comments. No comments were received from educational institutions, elected officials, or tribal governments.

ISSUE SUMMARY

Based on internal (within the BLM) and external scoping, the following planning issues have been identified. Comments received were classified into the planning issues below and into subcategories where appropriate.

1. How can the BLM achieve a sustainable wild horse population in the planning area while minimizing the number of horses in long-term holding facilities?
2. How should the BLM manage wild horses to ensure access to clean water for horses, livestock, and other wildlife?
3. How should the BLM manage livestock grazing to meet rangeland health standards in an area that also provides forage for a wild horse population?
4. What measures should be put in place to meet land health standards while providing forage for wild horses and other wildlife?
5. How can the BLM realize the socioeconomic benefits of tourism while protecting sensitive resources (e.g., cultural, paleontological, wildlife, vegetation, and visual)?

6. How should the BLM balance tourism associated with a wild horse population with existing recreational uses?
7. How will the BLM manage a wild horse population while protecting special status species?
8. How should the BLM manage lands to sustain a wild horse population while recognizing valid existing mineral rights in the project vicinity?
9. How will the BLM manage a wild horse population while protecting sensitive cultural and paleontological resources? What measures should be put in place to reduce impacts of a wild horse population on ongoing vegetation and habitat treatment/restoration efforts? How will the BLM continue to meet its goals and objectives for special management areas in the planning area while managing a wild horse population?

The BLM will use the planning issues to help guide the development of a reasonable range of alternative management strategies for the RMP amendment/EIS. In addition to planning issues, comments also addressed issues that are policy or administrative actions and issues that are outside the scope of the RMP amendment/EIS.

FUTURE STEPS

Scoping is the first opportunity for public involvement in the RMP amendment/EIS process. The BLM will use the information collected during the scoping period to formulate alternatives and prepare the Draft RMP Amendment/EIS, which is anticipated to be published in 2013. Release of the Draft RMP Amendment/EIS will be announced in a Notice of Availability in the Federal Register and in the local media, and additional public meetings will be held to solicit public comment on the draft document. At the conclusion of the public comment period, the Draft RMP Amendment/EIS will be revised, and a Proposed RMP Amendment/Final EIS will be published and made available for public review. While these are the formal opportunities for public involvement during the RMP amendment/EIS process, the BLM welcomes input from the public throughout the RMP amendment/EIS process.

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CHAPTER I

INTRODUCTION

Under the National Environmental Policy Act (NEPA) of 1969 (Public Law 91-190) and the Council on Environmental Quality regulations implementing NEPA (40 Code of Federal Regulations [CFR] 1500-1501), federal agencies are required to consider the environmental effects of their actions prior to taking such actions. Actions that are subject to NEPA include projects and programs that are entirely or partially financed, assisted, conducted, regulated, or approved by federal agencies; new and revised agency rules, regulations, plans, policies, or procedures; and legislative procedures (40 CFR 1508.18). The actions being considered by the United States (US) Department of the Interior, Bureau of Land Management (BLM), Wells Field Office (WFO) in relation to the proposed Northeast Nevada Wild Horse Eco-Sanctuary (Eco-Sanctuary) are subject to the requirements of NEPA.

The BLM is preparing an environmental impact statement (EIS) to satisfy NEPA requirements for a joint public-private Wild Horse Partnership and Eco-Sanctuary on BLM-administered and private lands. As required by NEPA, the EIS for the Eco-Sanctuary will analyze a range of alternatives that may include land use planning actions as well as implementation actions such as a comprehensive management plan for the proposed Eco-Sanctuary. At the end of the EIS process, the BLM will select one of the alternatives for implementation, which may result in a resource management plan (RMP) amendment to the WFO RMP.

I.1 PURPOSE AND NEED FOR THE RESOURCE MANAGEMENT PLAN AMENDMENT

A growing concern for the increasing costs to manage the wild horse and burro program and a general sense that the current system for wild horse gathering, holding, and adoptions is not working; combined with the applicable laws, orders, and policies that require BLM to manage and care for the wild horse populations on BLM lands; has created a need for the BLM to consider new and innovative methods to address the long-term management of excess wild horses on western rangelands. Finding the appropriate locations and management

actions for the best outcome of the horses requires consideration of many variables, including topography, distance to water, public awareness and participation, cultural resources and tribal concerns, economic stimulus through eco-tourism, and other environmental constraints. Current land use plans provide for Herd Areas and Herd Management Areas (HMAs) but generally have not addressed a more comprehensive approach to wild horse management taking into account these factors. Therefore, under current plans, management for wild horse populations has followed the same methods that result in low wild horse adoption numbers, appropriate management levels being exceeded, and rangeland resources being damaged.

The purpose of the RMP amendment is to modify land use plan decisions in order to create the Northeast Nevada Wild Horse Eco-Sanctuary, a joint public-private Wild Horse Partnership on BLM-administered and private lands. Creation of the Eco-Sanctuary requires BLM to amend the WFO RMP to identify the Eco-Sanctuary as a Herd Area and HMA, to retire the majority of the Spruce Grazing Allotment and associated animal unit months, and to identify design features and best management practices to protect resource values and uses. As part of the purpose and need for the Eco-Sanctuary, the following objectives have been identified to help analyze an alternative's effectiveness at meeting the stated purpose and need. The Eco-Sanctuary would:

- help the BLM feed and care for excess wild horses that have been removed from public rangelands at a cost equal to or less than the current costs of holding an equal number of wild horses in a long-term holding facility;
- support a non-reproducing wild horse herd;
- assist the BLM in achieving and maintaining appropriate management levels within the HMAs and maintain those levels to assure the horses and the range remain in good condition;
- provide unique opportunities to view and learn about the cultural heritage of wild horses, their history, and their potential as working horses, therapy horses, show horses, etc.;
- stimulate local economies through the marketing of eco-tourism and local community job creation; and
- contain BLM-approved perimeter fencing.

Additionally, the ROD would include a comprehensive Eco-Sanctuary Management Plan that would provide appropriate implementation actions to manage for care of wild horses, eco-tourism, recreation, education and public outreach, and land use authorizations. Objectives for the Eco-Sanctuary Management Plan would be to:

- ensure the humane care and management of wild horses;

- provide facilities that can provide the food, water and shelter necessary to sustain a minimum of 200 horses in good condition which means ribs cannot be visually distinguished, but can be easily felt; backbone is not visible; hip bones do not show; withers are distinguishable but do not protrude; shoulders and neck blend smoothly into the body;
- provide a public benefit by raising public awareness and participation in the Wild Horse and Burro Program, thereby increasing the total number of annual wild horse adoptions;
- provide regular, on-the-ground monitoring of the wild horses to ascertain their well-being and safety;
- provide care by partnership organizations who are knowledgeable and experienced about the behavior and nutritional requirements of equines and the management of the land they inhabit for the sustained production of grass and other desirable forage plants;
- provide veterinary services to animals;
- provide a proactive fund-raising campaign which funds will be utilized to support the humane care and management of wild horses; and
- promote public visitation to the Eco-Sanctuary.

I.2 DESCRIPTION OF THE PLANNING AREA

The planning area is the proposed Eco-Sanctuary area, which encompasses approximately 17,000 acres of private land, controlled by Saving America's Mustangs and other private entities, and 508,000 acres of public land within the boundaries of the current Spruce Grazing Allotment. The private land within the planning area will not be subject to decisions made in the RMP amendment/EIS. The planning area is located approximately 25 miles south of Wells, Nevada, between US Highway 93 and Alternate US Highway 93 (**Figure I-1**, Northeast Nevada Wild Horse Eco-Sanctuary Planning Area). Seventy percent of the planning area overlaps with portions of three existing HMAs. **Table I-1**, Percentage of HMAs in the Planning Area provides detail on the overlap.

Table I-1
Percentage of HMAs in the Planning Area

HMA	Percent of HMA in Planning Area
Spruce-Pequop	93
Goshute	27
Antelope Valley	14

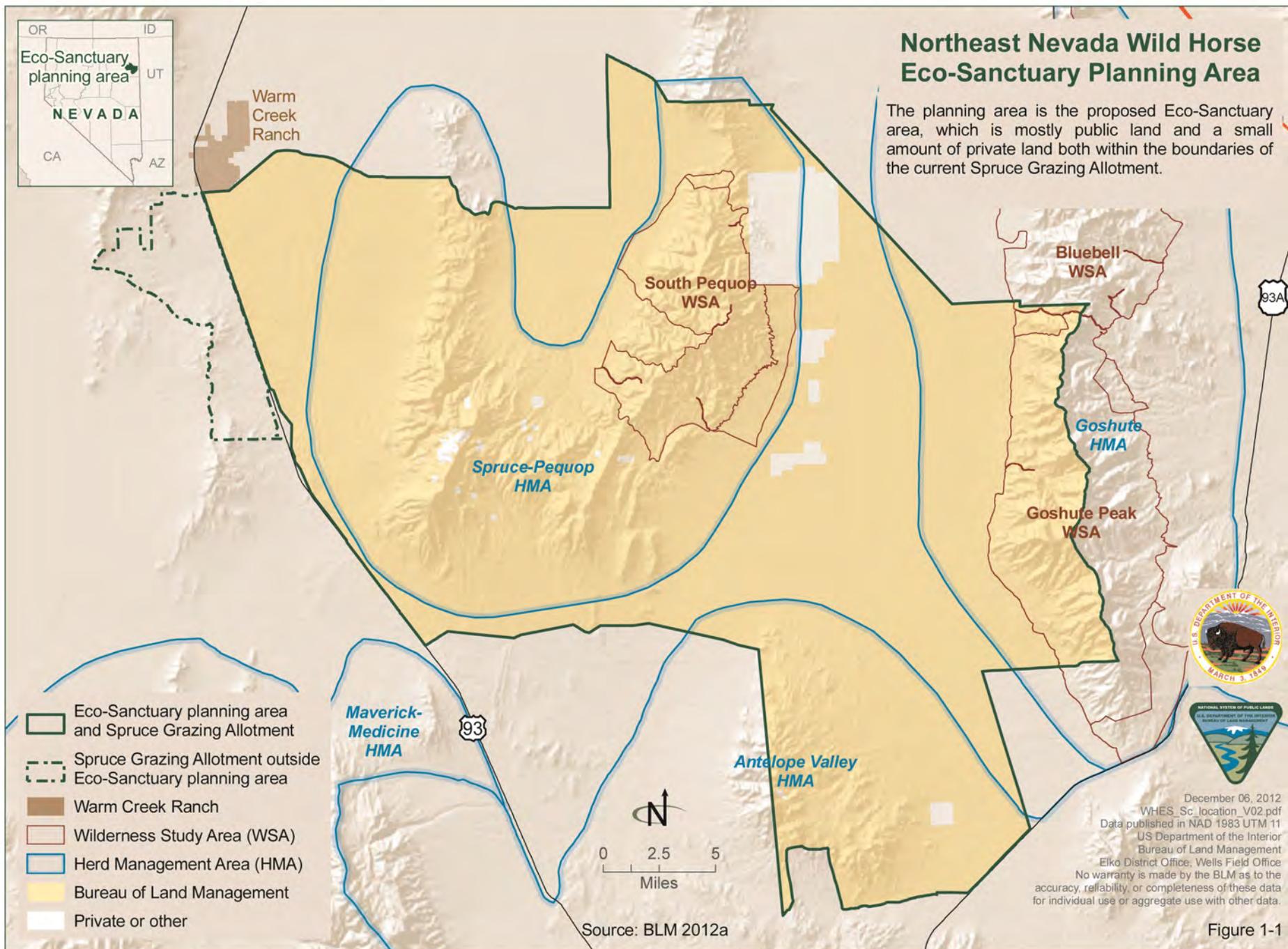


Figure 1-1

I.3 OVERVIEW OF THE PUBLIC INVOLVEMENT PROCESS

Public involvement is a vital and legally required component of both the RMP amendment and EIS processes. Public involvement provides the opportunity for those affected by actions to take part in the decision-making process and facilitates full environmental disclosure. Guidance for implementing public involvement under NEPA is codified in 40 CFR 1506.6, ensuring that federal agencies make a diligent effort to involve the public in the NEPA process. Section 202 of the Federal Land Policy and Management Act (FLPMA) directs the Secretary of the Interior to establish procedures for public involvement during land use planning actions on public lands. Guidance for implementing public involvement during land use planning actions on public lands can be found in the BLM's Land Use Planning Handbook (H-1601-1) (BLM 2005). Public involvement requirements of both NEPA and FLPMA will be satisfied through this RMP amendment/EIS process.

Public involvement is being conducted throughout the course of the RMP amendment/EIS process; however the public will have specific opportunities to comment during three phases:

- public scoping before NEPA analysis begins, to determine the scope of issues and alternatives to be addressed in the RMP amendment/EIS (this occurred during the August 15 – September 19 scoping period);
- public review of and comment on the Draft RMP Amendment/EIS; and
- public review of the Final RMP Amendment/EIS.

This scoping summary report documents the results of the first phase of the public involvement process.

Scoping is an early and open process for determining the scope of issues to be addressed and identifying the significant issues related to a proposed action. The BLM may use information collected during scoping to develop the alternatives to be addressed in a NEPA document. The process has two components: internal scoping and external scoping. Internal scoping is conducted within an agency or cooperating agencies to determine preliminary and anticipated issues and concerns. An interdisciplinary team of BLM WFO resource specialists held internal scoping meetings to identify the anticipated planning issues and the methods, procedures, and data to be used in developing the RMP amendment/EIS.

External scoping is a public process designed to reach beyond the BLM to identify the concerns of high importance to the public. External scoping helps ensure that real problems are identified early and properly studied, that issues of no concern do not consume time and effort, and that the proposed action and alternatives are balanced, thorough, and able to be implemented.

In accordance with 43 CFR 1610.2(d), the BLM must document the scoping results. The BLM's land use planning guidance (BLM 2005) also requires the documentation of public involvement. This scoping report summarizes the scoping process and the separate comments received during the formal external scoping period. It also describes the issues from public scoping meetings and internal scoping meetings and includes a discussion of how these comments will be incorporated into the RMP amendment/EIS.

I.4 DESCRIPTION OF THE SCOPING PROCESS

The BLM follows the public involvement requirements documented in the Council on Environmental Quality regulations implementing NEPA (40 CFR 1501.7 for scoping and 1506.6 for public involvement). The BLM also follows public involvement requirements described in the BLM's planning regulations (43 CFR 1601-1610). The BLM solicits comments from relevant agencies and the public, and organizes and analyzes all comments received to identify the issues that will be addressed during the planning and NEPA processes. These issues define the scope of analysis for the RMP amendment/EIS and are used to develop the project alternatives.

I.4.1 Notice of Intent

The scoping period for the Northeast Nevada Wild Horse Eco-Sanctuary RMP Amendment/EIS began with the publication of the Notice of Intent (NOI) in the Federal Register on August 15, 2012. The NOI published was titled "Notice of Intent to Prepare an Environmental Impact Statement for Proposed Wild Horse Eco-Sanctuary in Elko County, Nevada, and an Associated Resource Management Plan Amendment for the Wells Field Office." The NOI:

- noted that all comments must be received prior to the close of the 30-day scoping period, or 15 days after the last public meeting, whichever is later;
- indicated that the scoping meetings would be announced at least 15 days in advance through local media, mailings to interested individuals, and the BLM Elko District website;
- provided information on how to submit comments;
- provided a brief overview of the Saving America's Mustangs proposal;
- stated the goal of the EIS and the purposes the EIS would serve;
- provided a list of preliminary issues and planning criteria;
- stated that the BLM would consult with Native American tribes and would fulfill the requirements under Section 106 of the National Historic Preservation Act; and
- explained how the BLM would incorporate scoping comments into the RMP amendment/EIS process.

I.4.2 Project Website

A public website was launched and is regularly updated to provide the public with the latest information about the RMP amendment/EIS process. The website, available at http://www.blm.gov/nv/st/en/fo/elko_field_office/blm_information/nepa/nenvwh_ecosanctuary.html, provides background information about the project along with maps and photos of the planning area.

I.4.3 Press Release

On August 15, 2012, the BLM distributed a press release titled “BLM Begins Process to Analyze Proposed Northeast Nevada Wild Horse Eco-Sanctuary” to media outlets across Nevada and northern California. The press release provided the dates and venues for the three scoping houses (Wells, Reno, and Elko, Nevada; see **Section I.4.6**, Scoping Open Houses), introduced the proposal and preliminary issues, and described the various methods for submitting comments, including dedicated email and postal addresses. The press release is included in **Appendix A**, Scoping Materials.

I.4.4 Interested Public Letter and Mailing List

In August 2012, the BLM mailed a letter announcing the start of the public scoping period for the Northeast Nevada Wild Horse Eco-Sanctuary RMP Amendment/EIS to 66 individuals from the public, agencies, elected officials, and organizations who had expressed interest in the Eco-Sanctuary or had participated in related WFO planning efforts. The letter included the press release, which provided the dates and venues for the three scoping open houses, introduced the proposal and preliminary issues, and described the various methods for submitting comments. The BLM will publish future letters for the interested public at major project milestones and will mail or email them to individuals and organizations that are currently on or have requested to be added to the project mailing list.

Interested public may request to receive letters and other notifications through electronic or postal mail. The letter sent in August 2012 is included in **Appendix A**, Scoping Materials.

I.4.5 Newspaper Articles and Television Reports

One local newspaper and one local television station are known to have published their own articles or commentary covering the proposed Eco-Sanctuary, RMP amendment/EIS, and scoping period. In addition, two newspapers and one television station outside the local area published articles covering the RMP amendment/EIS. **Table I-2**, Newspaper Articles and Television Reports, lists the media outlets and report dates.

I.4.6 Scoping Open Houses

The BLM hosted three open houses to provide the public with opportunities to become involved, to learn about the project and the planning process, to meet the Northeast Nevada Wild Horse Eco-Sanctuary RMP Amendment/EIS team

**Table I-2
Newspaper Articles and Television Reports**

Newspaper or Television Station	Date(s) Article(s) or Report Appeared
Local News Outlets	
Elko Daily Free Press	June 26; August 17; September 7, 25, and 26; and October 5 and 29, 2012
KENV-TV Elko	October 2, 2012
News Outlets Outside the Local Area	
Sacramento Bee	August 15, 2012
Las Vegas Sun	August 15, 2012
KTVN	August 21, 2012 (updated August 28, 2012)

members, and to offer comments. The open houses were advertised via press release and the project newsletter. The locations of the open houses are provided in **Table I-3**, Scoping Open Houses.

Scoping meetings were held in an open house format to encourage participants to discuss concerns and questions with the BLM. Copies of the scoping brief and a handout on NEPA, as well as blank scoping comment forms, were available. Maps illustrated the area of the proposed Eco-Sanctuary; alternatives for fencing at the eastern border of the proposed Eco-Sanctuary; current and proposed HMAs and Herd Areas; seedings, roads, and range improvements; and proposed wildlife areas.

**Table I-3
Scoping Open Houses**

Location	Venue	Date	Number of Attendees
Wells	Wells City Hall	August 29, 2012	21
Reno	Hyatt Place, Reno—Meeting Room 1	August 30, 2012	12
Elko	Elko Convention Center—Cedar Room	September 4, 2012	17

I.5 COLLABORATIVE INVOLVEMENT PROCESS

In addition to formal scoping, the BLM is implementing collaborative outreach and will work closely with cooperating agencies and tribes. These efforts are summarized below. The BLM will continue to meet with interested agencies and organizations throughout the planning process and will coordinate closely with partners.

I.5.1 Cooperating Agencies

A cooperating agency is any federal, state, or local government agency or Native American tribe that enters into a formal agreement with the lead federal agency

to help develop an environmental analysis. More specifically, cooperating agencies “work with the BLM, sharing knowledge and resources, to achieve desired outcomes for public lands and communities within statutory and regulatory frameworks” (BLM 2005). The benefits of enhanced collaboration among agencies in preparing NEPA analyses are:

- disclosing relevant information early in the analytical process;
- applying available technical expertise and staff support;
- avoiding duplication with other federal, state, tribal, and local procedures; and
- establishing a mechanism for addressing intergovernmental issues.

The BLM is in the process of inviting stakeholders and tribes in the area to be cooperating agencies in accordance with 43 CFR 1610.3. Cooperating Agencies will be engaged throughout the development of the Draft RMP Amendment/EIS to ensure that decisions are commensurate with other agency plans and programs, as well as provide feedback to the BLM to generate a reasonable range of alternatives. Some of the roles and responsibilities of Cooperating Agencies include:

- issue and concern identification (scoping);
- data collection;
- comment on technical and baseline reports;
- comment on the Internal Draft RMP Amendment/EIS;
- thorough review of the public Draft RMP Amendment/EIS; and
- review public comments on the Draft RMP Amendment/EIS and help prepare the Final RMP Amendment/EIS.

Table I-4, Prospective Cooperating Agencies, shows the list of potential Cooperating Agencies identified by the BLM. Agencies accepting invitations to be cooperating agencies will sign a Memorandum of Understanding with the BLM. The Memorandum of Understanding outlines the interests, expertise, and jurisdictional responsibilities of both the agency and its cooperating agency partners and also outlines their respective roles and responsibilities in the planning and NEPA processes.

1.5.2 Resource Advisory Council

A Resource Advisory Council (RAC) is a committee established by the Secretary of the Interior to provide advice or recommendations to BLM management (BLM 2005). A RAC is generally composed of 15 members of the public, representing different areas of expertise. The Mojave-Southern Great Basin and Northeastern Great Basin RACs include members appointed to represent constituent public land users and provide input on public management

**Table I-4
Prospective Cooperating Agencies**

Agencies and Tribes Invited to be Cooperators
City of Elko
City of Wells
City of West Wendover
Duckwater Shoshone Tribe
Elko County
Ely Shoshone Tribe
Goshute Indian Tribe
Hill Air Force Base
Nevada Department of Agriculture
Nevada Department of Conservation and Natural Resources
Nevada Department of Wildlife
Nevada Division of Environmental Protection
Nevada Division of Forestry
Nevada Division of State Lands
Nevada Division of Water Resources
Shoshone-Paiute Tribes
State Historic Preservation Office
US Animal and Plant Health Inspection Service
US Army Corps of Engineers
US Environmental Protection Agency
US Fish and Wildlife Service
US National Park Service
US Natural Resources Conservation Service
Wells band of the Te-Moak Tribe of Western Shoshone Indians

issues to the BLM. Recommendations are based on consensus building and collaboration.

On July 19 and 20, 2012, the BLM conducted a field tour of the proposed Eco-Sanctuary for the Mojave-Southern and Northeastern Great Basin RACs. In September 2012, the Mojave-Southern Great Basin RAC submitted a letter providing recommendations for the Northeast Nevada Wild Horse Eco-Sanctuary RMP Amendment/EIS. The Northeastern Great Basin RAC formed a subcommittee in September 2012 to draft a similar recommendation letter. The RACs will be kept informed of the RMP amendment/EIS progress through reports given at their regular meetings.

1.5.3 Collaboration and Consultation with Tribes

The WFO has initiated consultation with tribes that are identified as having interests or Traditional Cultural Properties in the planning area. Consultation will be that required by the National Historic Preservation Act and the American Indian Religious Freedom Act. The identified tribes are Duckwater

Shoshone Tribe, Goshute Indian Tribe, Shoshone-Paiute Tribes, and Wells band of the Te-Moak Tribe of Western Shoshone Indians.

No written comments were received from tribal agencies during the scoping period. Tribal concerns or issues have been typically presented in oral format. Government-to-government consultation will continue throughout the RMP amendment/EIS process to ensure that the concerns of tribal groups are considered during the development of the RMP amendment/EIS.

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CHAPTER 2

COMMENT SUMMARY

2.1 METHOD OF COMMENT COLLECTION AND ANALYSIS

All written submissions received on or before September 19, 2012, were evaluated and are documented in this Scoping Summary Report. All comments received during the RMP amendment/EIS process will be considered in alternative formulation and project planning.

A total of 205 unique written submissions were received during the public scoping period and resulted in 862 unique comments. The most common format used for submissions was e-mail. Submissions were also mailed via US Mail or faxed. Comment forms were completed at the public scoping meetings.

In addition to unique submissions, letter campaigns from non-profit organizations and individuals resulted in form letter submissions for a number of topics. Details of form letter submission are included in **Appendix B**, List of Commenters, **Table B-2**, Form Letter Submissions. Letters that represented slight variations of the form letter without substantive additional information were treated as form letters. When substantive unique comments were added to the form letter, these comments were entered into the comment-tracking database and included in the total number of unique comments above. In total, six different form letters were received. Out of the six form letters, three were submitted by fewer than 15 people. The remaining three letters were submitted by more substantial numbers of people. All of these form letters were part of a campaign by the American Wild Horse Preservation Campaign. One letter from this group was submitted by 191 people; another was submitted by 562 people; and a third was submitted by 2,864 people. Form letters without substantive comments added are not included in the calculations of affiliation and geographic location percentages.

A list of commenters and the dates of submittal are provided in **Appendix B**, List of Commenters. Most written submissions included more than one

comment, so the 205 submissions plus form letters with substantive comments added yielded 862 discrete comments. The comment forms provided instructions for requesting confidentiality and for withholding individual names or addresses from public review or from disclosure under the Freedom of Information Act. No comments were submitted anonymously.

To ensure that public comments were properly registered and that none were overlooked, a multi-phase management and tracking system was used. First, written submissions were logged and numbered. Once all comments were received and documented, the BLM assigned a planning classification to each issue. These classifications detail which issues raised will be resolved through the current planning effort. Planning classifications are as follows:

- 1: Issues that will be resolved in the RMP amendment/EIS;
- 2: Issues that will be addressed through BLM policy or administrative action (National and BLM policy); and
- 3: Issues that are beyond the scope of this RMP amendment/EIS that will be considered but not addressed.

To assist with the analysis, the BLM entered comments into the Public Input and Comment Tracking database and organized comments by planning issue categories and affiliation of the commenter. Finally, these identifiers were queried and tallied to provide information on planning and other issue categories. Details of comments received by planning issue are included in **Section 2.2.4**, Number of Comments by Planning Issue Category. Nonsubstantive comments were not entered into the database, although commenters who submitted nonsubstantive unique (i.e., non-form letter) comments are included in data on commenter affiliation and geographic area. These commenters are also included in **Table B-1**, Commenters. Nonsubstantive comments had little relevance to the RMP amendment/EIS process or represented commentary regarding resource management without any real connection to the issues to be addressed in the RMP amendment/EIS. These comments did not help to define the scope of analysis for the RMP amendment/EIS for developing the project alternatives, and they are not addressed further in this document.

2.2 SUMMARY OF PUBLIC COMMENTS RECEIVED

2.2.1 Commenters by Affiliation

Table 2-1, Commenters by Affiliation, and **Figure 2-1**, Commenters by Affiliation, show the number and proportion of commenters with each type of affiliation. Letters on business, agency, or organization letterhead, or where the commenter signed using their official agency title, were considered to represent that organization. All other letters were considered to represent individuals. A total of 165 members of the general public (83 percent of commenters)

provided written submissions during the scoping period, 27 organizations or non-profit groups (13 percent of commenters) submitted comments, and 4 businesses (2 percent of commenters) submitted comments. No federal agencies provided comments, though 1 state agency (less than 1 percent of commenters) submitted comments and 2 local governmental agencies (1 percent of commenters) submitted comments. No comments were received from educational institutions, elected officials, or tribal governments. A list of commenters, their affiliations, and the submittal date of their comments is included in **Appendix B**, List of Commenters. Some commenters made multiple submissions, and some letters had more than one signatory, therefore the total for commenters by geographic area is not equal to the total letter submissions.

**Table 2-1
Commenters by Affiliation¹**

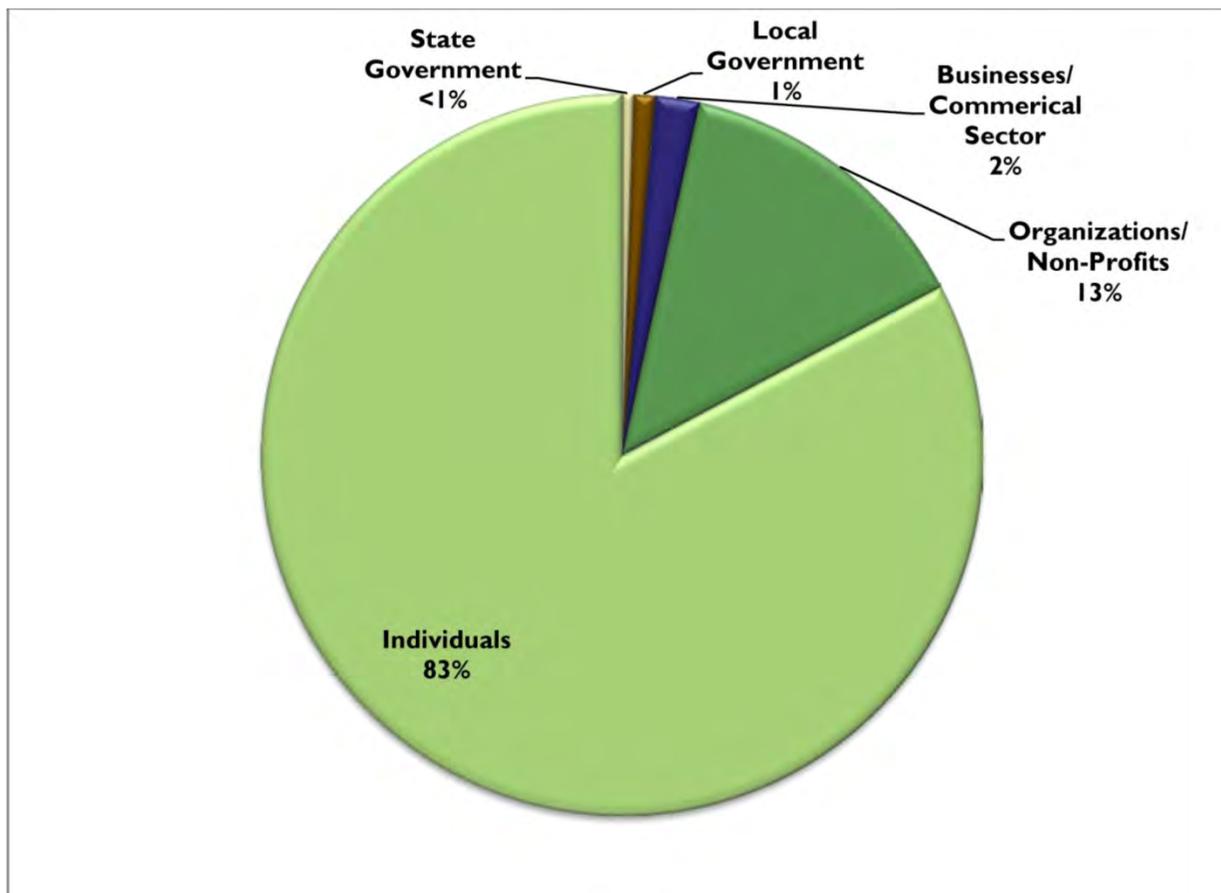
Affiliation	Number of Commenters	Percentage of Total Commenters
Government	3	1%
<i>Federal</i>	0	0%
<i>State</i>	1	<1%
<i>Local</i>	2	1%
Elected Officials	0	-
Educational Institutions	0	-
Businesses/Commercial Sector	4	2%
Organizations/Non-profits	27	13%
Individuals	165	83%
Tribal Government	0	-
Total	199	100%

¹Calculations do not include form letters without substantive comments added.

2.2.2 Commenters by Geographic Area

Table 2-2 and **Figure 2-2**, Commenters by Geographic Area, show the number and proportion of commenters by their geographic location. A total of 31 commenters (16 percent) were from within Nevada. Of the remaining commenters, 100 (50 percent) were in other states in the US, primarily California. Four commenters (2 percent) were from other countries. Of the 199 commenters, 64 (32 percent) did not indicate a geographic location. Note that these calculations do not include form letter submissions. In addition, some commenters made multiple submissions, and some letters had more than one signatory, therefore the total for commenters by geographic area is not equal to the total letter submissions.

**Figure 2-1
Commenters by Affiliation**



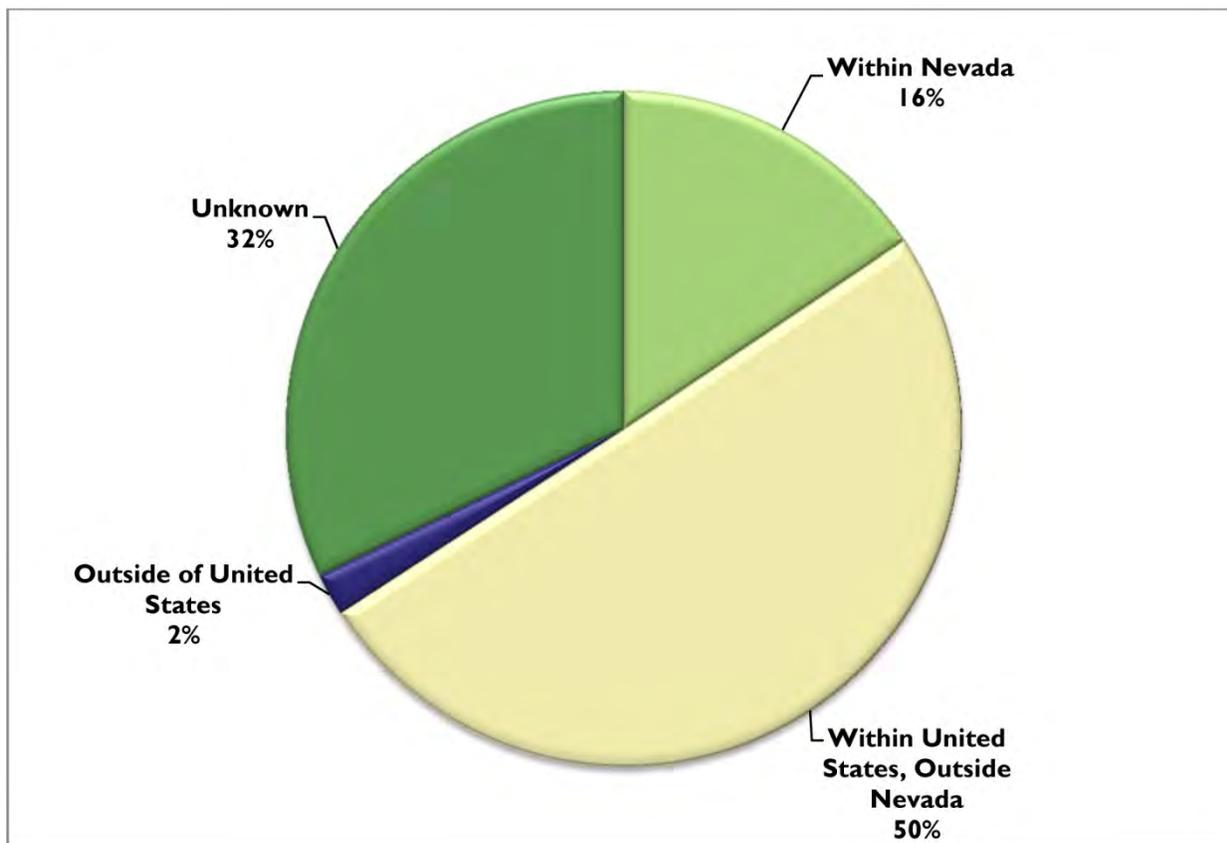
**Table 2-2
Commenters by Geographic Area¹**

Location	Number of Commenters	Percentage of Total Commenters
Within Nevada	31	16%
Other States within the US	100	50%
Outside of the US	4	2%
Unknown	64	32%
Total	199	100%

¹Calculations do not include form letters without substantive comments added.

Commenter location within Nevada was further examined by city of commenter. In Nevada, Reno (16 percent), Las Vegas (13 percent), Spring Creek (10 percent), Elko (10 percent), Wells (6 percent), and Ely (6 percent) had the highest number of commenters (**Table 2-3, Commenter Location within Nevada**).

Figure 2-2
Commenters by Geographic Area



2.2.3 Number of Comments by Issue or Other Category

Table 2-4, Comments by Issue or Other Category, shows the number of issues raised that will or will not be addressed in the RMP amendment/EIS. Of the 862 comments received, 517 (62 percent of comments that will be addressed) were related to a planning issue that will be addressed in the RMP amendment/EIS. These comments are discussed in detail below and in **Chapter 3**, Issue Summary. In addition, 320 comments (38 percent of comments that will be addressed) were related to issues that will be addressed in the RMP amendment/EIS but do not fall within a specific planning issue category. These comments included general comments on the Eco-Sanctuary proposal and the RMP amendment/EIS process, alternatives development, collaboration, and requirements of NEPA and other regulations (see **Section 3.3.12**, Other Issues to Be Addressed in the RMP Amendment/EIS). The remaining 25 comments were: 1) issues beyond the scope of the RMP amendment/EIS (80 percent of comments that will not be addressed) or 2) issues that will be resolved through national policy or administrative action (20 percent of issues that will not be addressed). See **Section 3.4**, Issues That Will Not Be Addressed in the RMP Amendment/EIS, for more detail.

**Table 2-3
Commenter Location within Nevada¹**

Location	Number of Commenters	Percentage of Commenters in Nevada
Reno	5	16%
Las Vegas	4	13%
Spring Creek	3	10%
Elko	3	10%
Wells	2	6%
Ely	2	6%
Baker	1	3%
Carson City	1	3%
Lamoille	1	3%
Minden	1	3%
Ruby Valley	1	3%
Sparks	1	3%
Wellington	1	3%
No City Provided	5	16%
Total	31	100%

¹Calculations do not include form letters without substantive comments added.

**Table 2-4
Comments by Issue or Other Category¹**

Issue or Other Category	Total	Percent of Total
Issues that will be addressed in the RMP Amendment/EIS		
Planning issues to be addressed in the EISs	517	62
General project planning issues	320	38
Total Comments Addressed	837	100
Issues that will not be addressed in the RMP Amendment/EIS		
BLM administrative or policy issue	5	20
Issues outside the scope of the EIS	20	80
Total Comments not Addressed	25	100

¹Does not include nonsubstantive comments.

Comments are provided in **Appendix C**, Comments by Resource Planning Issue. Comment letters can be viewed in their entirety at the Elko District Office in Elko, Nevada.

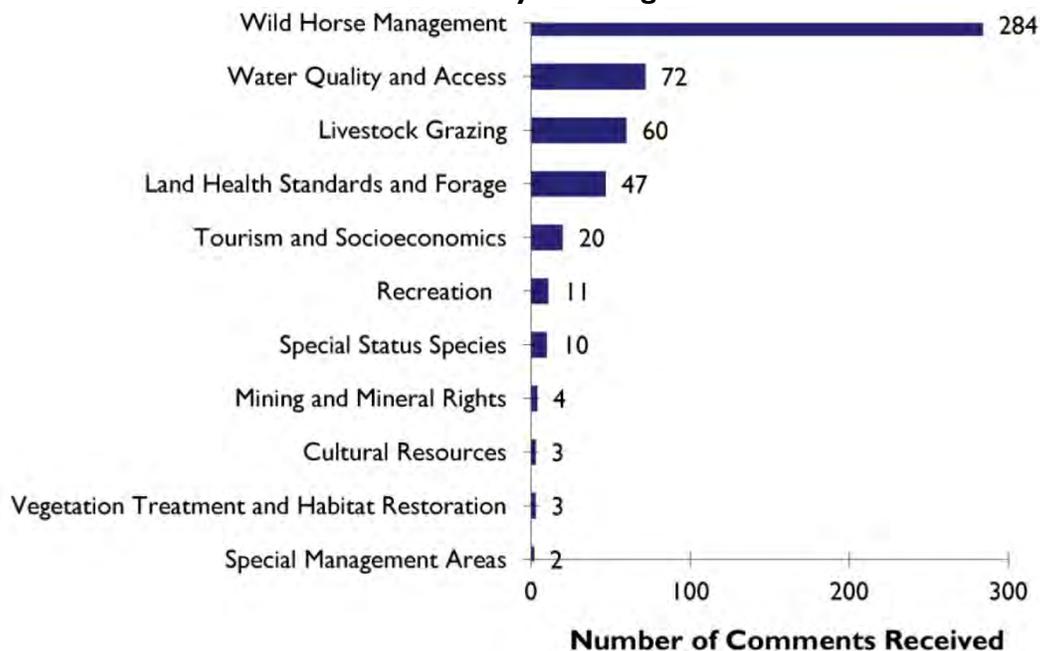
2.2.4 Number of Comments by Planning Issue Category

Table 2-5 and **Figure 2-3**, Comments by Planning Issue, show the number and proportion of comments received by planning issue category. The BLM received 517 planning issue comments and categorized them into 11 planning issue categories and the appropriate subcategories. **Chapter 3**, Issue Summary, provides a detailed analysis of the comments received for each planning issue category and subcategory.

Table 2-5
Comments by Planning Issue

Planning Issue Category	Number of Individual Comments	Percent of Total
Wild horse management	284	55
Water quality and access	72	14
Livestock grazing	60	11
Land health standards and forage	47	9
Tourism and Socioeconomics	20	4
Recreation	11	2
Special status species	10	2
Mining and mineral rights	4	1
Cultural resources	3	1
Vegetation treatment and habitat restoration	3	1
Special management areas	2	<1
Total	516	100

Figure 2-3
Comments by Planning Issue



Of the planning issue comments, 284 (55 percent) were related to Issue 1, wild horse management. The issue with the second highest number of comments was Issue 2, water quality and access, with 72 comments (14 percent of planning issue comments). Issue 3, livestock grazing, had the third most comments, with 60 comments (11 percent). Issue 4, concerned with land health standards and forage, received 47 comments (9 percent of planning issue comments). Issue 5, tourism and socioeconomics, received 20 comments (4 percent). Issue 6, recreation, received 11 comments (2 percent of planning issue comments). Issue 7, special status species, received 10 comments (2 percent). Issue 8, concerning mining and mineral rights, received 4 comments (1 percent). Issue 9, cultural resources, and Issue 10, vegetation treatment and habitat restoration, each received 3 comments (1 percent of planning issue comments for each). Finally, Issue 11, concerning special management areas, received the fewest comments with 2 (less than 1 percent of planning issue comments).

CHAPTER 3

ISSUE SUMMARY

Issue identification is the first of the nine-step BLM planning process. An issue, as defined in the BLM NEPA Handbook (H-1790-1) (BLM 2008), is a point of disagreement, debate, or dispute with a proposed action based on some anticipated environmental effect. An issue is more than just a position statement, such as disagreement with grazing on public lands. An issue:

- has a cause and effect relationship with the proposed action or alternatives;
- is within the scope of the analysis;
- has not been decided by law, regulation, or previous decision; and
- is amenable to scientific analysis rather than conjecture.

As defined in the BLM Land Use Planning Handbook (H-1601-1) (BLM 2005), planning issues are concerns or controversies about existing and potential land and resource allocations, levels of resource use, production, and related management practices. Issues include resource use, development, and protection opportunities to consider in RMP preparation. These issues may stem from new information or changed circumstances and from the need to reassess the appropriate mix of allowable uses.

3.1 PLANNING ISSUE DEVELOPMENT

The BLM enacted a multi-step issue identification process for the Northeast Nevada Wild Horse Eco-Sanctuary RMP Amendment/EIS. The process began with internal scoping within the BLM to develop the initial purpose of and need for the RMP amendment/EIS. Internal scoping also highlighted anticipated planning issues, management concerns, and preliminary planning criteria.

The BLM issued the NOI to prepare an RMP amendment/EIS in August 2012. The NOI initiated the formal scoping period as required by NEPA and solicited

written comments from the public (further discussed in **Section 1.4**, Description of the Scoping Process). Scoping is a collaborative public involvement process implemented to identify and refine planning issues to address in the planning process. During the scoping period, the BLM also engaged tribes, RACs and cooperating agencies, as discussed in **Section 1.5**, Collaborative Involvement Process. The BLM hosted three open houses throughout Nevada to solicit written comments from the public during the scoping period. Comments received during the scoping period provided additional information on the public's concerns and suggestions regarding the planning area to the BLM.

Information accepted during internal and external scoping was compiled to develop discrete planning issue statements. These statements are provided in **Section 3.2**, Planning Issue Statements. The purpose of these planning issue statements is to highlight the key issues distilled from these initial planning and scoping processes. The issues are also discussed in **Section 3.3**, Summary of Public Comments by Resource Planning Issue Category, according to the various issue categories and associated comments received from interested individuals, agencies, elected officials, businesses, and organizations. The BLM will use the planning issue statements, planning criteria, and other information collected in the early planning and scoping phases of the RMP amendment/EIS process to help formulate a reasonable range of alternative management strategies that will be analyzed during the RMP amendment/EIS process.

3.2 PLANNING ISSUE STATEMENTS

A planning issue is a conflict over resource management activities, allocations, or land use that is discrete and well defined and can be addressed by a variety of approaches. The BLM has taken information about planning issues gathered during internal and external scoping and developed planning issue statements to define these conflicts in a manner that will guide the development of alternatives.

The planning issue statements presented below are preliminary and based on the information received to date. The process of developing the RMP amendment/EIS will afford many opportunities for collaboration on these issues with local, state, federal, and tribal governments; land-management agencies; public interest groups; and public land users. As a result, these statements may need to be refined to reflect public comments and concerns.

The planning issues the WFO will address in the RMP amendment/EIS are listed below. Each issue has several sub-topics, issue questions, and management concerns that address more specific uses and resources. Planning issue statements include the following:

- Issue 1. How can the BLM achieve a sustainable wild horse population in the planning area while minimizing the number of horses in long-term holding facilities?

- Issue 2. How should the BLM manage wild horses to ensure access to clean water for horses, livestock, and other wildlife?
- Issue 3. How should the BLM manage livestock grazing to meet rangeland health standards in an area that also provides forage for a wild horse population?
- Issue 4. What measures should be put in place to meet land health standards while providing forage for wild horses and other wildlife?
- Issue 5. How can the BLM realize the socioeconomic benefits of tourism while protecting sensitive resources (e.g., cultural, paleontological, wildlife, vegetation, and visual)?
- Issue 6. How should the BLM balance tourism associated with a wild horse population with existing recreational uses?
- Issue 7. How will the BLM manage a wild horse population while protecting special status species?
- Issue 8. How should the BLM manage lands to sustain a wild horse population while recognizing valid existing mineral rights in the project vicinity?
- Issue 9. How will the BLM manage a wild horse population while protecting sensitive cultural and paleontological resources?
- Issue 10. What measures should be put in place to reduce impacts of a wild horse population on ongoing vegetation and habitat treatment/restoration efforts?
- Issue 11. How will the BLM continue to meet its goals and objectives for special management areas in the planning area while managing a wild horse population?

Each planning issue as defined above may encompass a number of subcategories. Comments received during the public scoping period were classified into these subcategories as follows:

Issue 1: How can the BLM achieve a sustainable wild horse population in the planning area while minimizing the number of horses in long-term holding facilities?

- Wild horse management
- Wild horse capture and long-term holding
- Wild horse reproduction and family units
- Wild horse HMA boundaries and existing populations

Issue 2: How should the BLM manage wild horses to ensure access to clean water for horses, livestock, and other wildlife?

- Water resources
- Fencing

Issue 3: How should the BLM manage livestock grazing to meet rangeland health standards in an area that also provides forage for a wild horse population?

Issue 4: What measures should be put in place to meet land health standards while providing forage for wild horses and other wildlife?

- Vegetation, including riparian and wetland areas and noxious weeds
- Rangeland health effects of wild horses
- Wildlife

Issue 5: How can the BLM realize the socioeconomic benefits of tourism while protecting sensitive resources (e.g., cultural, paleontological, wildlife, vegetation, and visual)?

Issue 6: How should the BLM balance tourism associated with a wild horse population with existing recreational uses?

- Recreation
- Transportation and Travel management

Issue 7: How will the BLM manage a wild horse population while protecting special status wildlife species?

Issue 8: How should the BLM manage lands to sustain a wild horse population while recognizing valid existing mineral rights in the project vicinity?

Issue 9: How will the BLM manage a wild horse population while protecting sensitive cultural and paleontological resources?

Issue 10: What measures should be put in place to reduce impacts of a wild horse population on ongoing vegetation and habitat treatment/restoration efforts?

Issue 11: How will the BLM continue to meet its goals and objectives for special management areas in the planning area while managing a wild horse population?

Planning issue statements serve as a starting point to spark public consideration. These preliminary issue statements are not intended to be comprehensive or exhaustive. The BLM will continue to work with other government agencies,

tribal governments, and private and public stakeholders to refine planning issues and alternatives through the course of the RMP amendment/EIS process.

3.3 SUMMARY OF PUBLIC COMMENTS BY RESOURCE PLANNING ISSUE CATEGORY

Each comment received during public scoping was reviewed and coded according to planning issue. Of the 862 comments received, 517 comments (60 percent) were related to one of the planning issues defined above. In addition, 320 comments (37 percent) were related to issues that will be addressed in the RMP amendment/EIS but do not fall within a specific planning issue category. See **Table 2-5**, Comments by Planning Issue, for a breakdown of the number of comments received for each planning issue and subcategory. Summaries of the scoping comments received for each planning issue category, as well as general RMP amendment comments, are provided in **Sections 3.3.1**, Issue I, through **3.3.12**, Other Issues to Be Addressed in the RMP, below. These summaries provide details only on comments related to issues that will be resolved in the RMP amendment/EIS. Tables with all comments for each planning issue, as well as tables for issues that will not be addressed in the RMP amendment/EIS, are included in **Appendix C**, Comments by Resource Planning Issue. Adjustments or additions may be made to the planning issues as the planning process proceeds and the BLM continues to review information, meet with the interdisciplinary team, and talk with the public.

3.3.1 Issue I

Wild Horse Management

The BLM received 73 comments on general wild horse management (14 percent of planning issue comments), many of which argued that the BLM was doing too much to limit wild horse populations and HMAs in the Western US. However, some commenters advocated removal of all wild horses from public lands due to the impacts of these horses on ecosystems.

Wild Horse Capture and Long-term Holding

The BLM received 17 comments (3 percent of planning issue comments) related to wild horse capture and long-term holding. Many commenters asked for the BLM to reduce the number of wild horses in long-term holding facilities. Others stated that the proposed Eco-Sanctuary would be the same as a long-term holding facility because it would be fenced and would contain a non-reproducing herd. Some commenters asked the BLM to evaluate its methods for capturing horses from the proposed Eco-Sanctuary and adjacent HMAs.

Wild Horse Reproduction and Family Units

The BLM received 93 comments related to wild horse reproduction and family units (18 percent of planning issue comments). The majority of these commenters were opposed to any proposal to keep a non-reproducing herd in the proposed Eco-Sanctuary or to sterilize horses from existing HMAs in the planning area. Commenters characterized wild horse herds as naturally including

family units that would be disrupted by sterilization or separation of these units. Additionally, commenters expressed concern about what would happen to the wild horse population in the proposed Eco-Sanctuary as older horses died off. The health and safety of stallions during the castration process was another issue of concern. Some commenters described the importance of marking non-reproducing horses within the proposed Eco-Sanctuary so that invading reproducing horses could be identified and removed.

Wild Horse HMA Boundaries and Existing Populations

The BLM received 101 comments on wild horse HMA boundaries and existing populations in the vicinity of the planning area (20 percent of planning issue comments). These comments expressed opposition to removal or sterilization of horses from the three HMAs that overlap portions of the planning area. Commenters were concerned that the three overlapping HMAs would be removed, and they questioned the legality of replacing HMAs with the proposed Eco-Sanctuary. Other comments noted that putting fences through existing HMAs would cut off wild horses in those HMAs from their historic migratory routes and water sources. Some commenters advocated for the closure of the three overlapping HMAs with the proposed Eco-Sanctuary as a replacement.

3.3.2 Issue 2

Water Resources

The BLM received 25 comments on water resources issues (5 percent of planning issue comments). Concerns included access to water for existing wild horse populations and wildlife in the vicinity of the planning area, the impacts of wild horses and livestock on water quality, and injury to existing water rights in the area.

Fencing

The BLM received 47 comments (9 percent of planning issue comments) on fencing. Commenters expressed concerns about the effects of fencing the perimeter of the proposed Eco-Sanctuary, including preventing wild horses from accessing water, fragmenting existing HMAs, concentrating horse use on sensitive wildlife habitats, increasing collision mortality in birds, blocking wildlife migration corridors, and creating unnatural conditions for a wild horse population living within the proposed Eco-Sanctuary. Commenters also expressed concern about the cost to tax-payers of fencing such a large area. One commenter pointed out the risk that gates might be left open unintentionally or intentionally by members of the public.

3.3.3 Issue 3

Livestock Grazing

The BLM received 60 comments on livestock grazing issues (12 percent of planning issue comments). Many commenters suggested reducing animal unit months in the planning area before reducing the number of wild horses and

expressed concern about the effects of livestock on ecosystems and rangeland health. Other commenters were concerned that reduction or elimination of animal unit months could have negative impacts on the economy and on local ranchers.

3.3.4 Issue 4

Vegetation, Including Riparian and Wetland Areas and Noxious Weeds

The BLM received 8 comments on vegetation issues (2 percent of planning issue comments). Commenters expressed concern about the role of wild horses in spreading invasive plant species and asked whether the managers of the proposed Eco-Sanctuary would be required to invest in weed treatments and vegetation restoration projects.

Rangeland Health Effects of Wild Horses

The BLM received 17 comments on the effects of wild horses on rangeland health (3 percent of planning issue comments). These comments requested quantification of the effects of wild horses on rangeland health in comparison with effects of livestock. Some commenters argued that wild horses had a smaller effect on rangeland health than livestock, while others took the opposite point of view.

General Wildlife

The BLM received 22 comments on issues related to wildlife (4 percent of planning issue comments). These comments expressed concerns about various impacts on wildlife from the proposed Eco-Sanctuary, including cutting off access to water sources and migration routes and reducing available forage.

3.3.5 Issue 5

Tourism and Socioeconomics

The BLM received 20 comments on socioeconomic issues (4 percent of planning issue comments). Commenters characterized the proposed Eco-Sanctuary as good for the local economy due to the potential tourism revenue that could be brought in and as bad for the local economy if the value of cattle on the Spruce Grazing Allotment were lost.

3.3.6 Issue 6

Recreation

The BLM received 7 comments on recreation (1 percent of planning issue comments). These comments were concerned primarily with the loss of free access to public lands. One commenter noted the effect that fences could have on wildlife migration patterns and expressed concern that hunters could be impacted as well.

Transportation and Travel Management

The BLM received 4 comments related to transportation and travel management (1 percent of planning issue comments). Comments on this issue related to the loss of public access to roads within the planning area. One commenter suggested locating the proposed Eco-Sanctuary close to major public transportation routes to allow easier access by the public.

3.3.7 Issue 7***Special Status Wildlife Species***

The BLM received 10 comments on special status wildlife species issues (2 percent of planning issue comments). Protection of greater sage-grouse and sagebrush habitat from wild horses was a common concern. Commenters also requested protective measures for other special status species including pygmy rabbits and Columbia spotted frogs.

3.3.8 Issue 8***Minerals and Mining (Locatable Minerals)***

The BLM received 4 comments related to minerals and mining, comprising 1 percent of total planning issue comments. Two mining companies informed the BLM of their claims or mines in the vicinity of the planning area and expressed the desire that the proposed Eco-Sanctuary not impede exploration operations as authorized under the mining laws. Another commenter requested that extraction industries not be given preference over wild horses in HMAs.

3.3.9 Issue 9***Cultural and Paleontological Resources***

The BLM received 3 comments related to cultural resources (1 percent of planning issue comments). These comments highlighted the importance of protecting cultural resources within the planning area from damage by horses. A commenter also expressed concern about maintaining the public's free access to cultural resources within the planning area.

3.3.10 Issue 10***Conflicts with Other Projects in the Planning Area***

The BLM received 3 comments (1 percent of planning issue comments) on other projects in the planning area that could potentially conflict with the proposed Eco-Sanctuary. These comments related to the Spruce Mountain Restoration Project and its ability to successfully manage fuels and improve wildlife habitat in conjunction with wild horse activity in the area.

3.3.11 Issue 11

Special Management Areas, Including Areas of Critical Environmental Concern, Wild and Scenic Rivers, Wilderness, and Wilderness Study Areas

The BLM received 2 comments related to special management areas (less than 1 percent of planning issue comments). Commenters requested that the proposed Eco-Sanctuary fences lie outside the Goshute Peak, Bluebell, and South Pequop Wilderness Study Areas (WSAs) to avoid impacts on wilderness character and riparian ecosystems within those areas from increased use by wild horse populations.

3.3.12 Other Issues to Be Addressed in the RMP Amendment/EIS

Of the 862 comments received, 517 comments (60 percent) were related to planning issues that will be addressed in the RMP amendment/EIS (as discussed above). Another 320 comments (37 percent) focused on other topics, such as the planning process in general, opposition or support for the proposed Eco-Sanctuary, alternatives, or the public involvement process. These topics will be addressed in the RMP amendment/EIS but do not fit within any particular planning issue category. Comments are displayed in **Appendix C** (Comments by Resource Planning Issue), **Table C-3**, General Comments Related to the RMP Amendment/EIS.

3.4 ISSUES THAT WILL NOT BE ADDRESSED IN THE RMP AMENDMENT/EIS

The BLM received 25 comments (3 percent of the comments received) related to issues that will not be addressed in the RMP amendment/EIS. These include issues resolved through policy or administrative action and issues beyond the scope of the RMP amendment/EIS that have been considered but will not be included. These comments are represented in **Appendix C**, Comments by Resource Planning Issue, **Table C-1**, General Comments Outside the Scope of the RMP Amendment/EIS, and **Table C-2**, Comments Related to Issues to Be Solved by National Policy. Nonsubstantive comments are not included in the total above or in the comment tables.

Administrative or policy issue comments included issues pertaining to national BLM policy that will not be addressed during this RMP amendment/EIS process. Comments in this category primarily related to the BLM's overall management strategies for wild horses and burros.

Issues outside the scope of the RMP amendment/EIS include comments about land management on areas outside the planning area. Examples included opposition to other BLM projects adjacent to the planning area and general comments on HMAs across the Western US. This category also included comments on issues in which the BLM has limited or no administrative authority.

3.5 ANTICIPATED DECISIONS

This scoping report does not make any decisions, nor does it change current management direction set forth in the 1985 WFO RMP or the subsequent amendments to that RMP. Instead it summarizes those issues identified during the scoping period. The BLM will use planning issues summarized in this scoping report, along with subsequently identified issues, planning criteria, and other information (such as occurrence of cultural resources), to help formulate a reasonable range of alternatives during the next phase of the RMP amendment/EIS process. Each identified alternative (including continuation of existing management practices) will present planning-level actions and implementation actions (e.g., the Eco-Sanctuary Management Plan) for managing wild horses within the planning area. These decision types are described below. The BLM's evaluation of identified alternatives will be documented in an EIS prepared as part of the RMP amendment process, as required under NEPA.

3.5.1 Land Use Plan-level Decisions

Land use plan decisions for public lands fall into two categories: desired outcomes (goals and objectives) and allowable (including restricted or prohibited) uses and actions anticipated to achieve desired outcomes.

Goals are broad statements of desired outcomes, such as managing a sustainable wild horse population while protecting sensitive natural resources. Objectives are specific, quantifiable, and measurable desired conditions for resources, such as managing vegetation communities to achieve a certain level of forage by 2020.

After establishing desired outcomes, the BLM identifies allowable uses (land use allocations) and management actions for different alternatives that are anticipated to achieve the goals and objectives. Allocations identify areas where uses are allowed and any restrictions that may be needed to meet goals and objectives in these areas, and areas where uses would be excluded to protect resource values. Management actions are actions that are anticipated to achieve the desired outcomes; management actions could be proactive measures, such as measures that would be taken to enhance ecosystem function and condition.

3.5.2 Implementation-level Decisions

Implementation action is often characterized as project-level or activity-level decisions that generally constitute the BLM's final approval of on-the-ground actions to proceed (BLM 2005). Implementation decisions require more-detailed, site-specific environmental analysis than broader planning-level actions. Examples of an implementation decision are the Eco-Sanctuary Management Plan and any right-of-way permits.

For the proposed Eco-Sanctuary, implementation actions are being considered as part of a land use planning effort; therefore, they are subject to the appeals process or other administrative review as prescribed by specific resource program regulations after the BLM resolves the protests to land use plan

decisions and makes a decision to amend the RMP (High Desert Multiple Use Coalition, Inc. et al. Keith Collins, 142 IBLA 285 [1998]).

3.6 EXISTING MANAGEMENT

The BLM-administered public lands in the planning area are managed with direction from the 1985 WFO RMP (BLM 1985) and subsequent amendments. Amending this RMP is necessary to respond to a growing concern for the increasing costs of managing the wild horse program and a general sense that the current system for wild horse gathering, holding, and adoptions is not working. If completed, the RMP amendment will establish new land use planning actions to address issues identified through public scoping and, where appropriate, may incorporate decisions from the 1985 WFO RMP, as amended. Determining which, if any, existing management decisions to carry forward is part of the planning process. The BLM will review the existing management situation to determine which actions to carry forward and will identify where new management guidance should be developed. This review will be documented in the EIS.

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CHAPTER 4

PLANNING CRITERIA

During its initial project discussions, the BLM WFO staff developed preliminary planning criteria. Planning criteria establish constraints, guidelines, and standards for the planning process. They help planners define the scope of the process and estimate the extent of data collection and analysis. Planning criteria are based on standards prescribed by applicable laws and regulations; agency guidance; results of consultation and coordination with the public, other federal, state, and local agencies, and Indian tribes; analysis of information pertinent to the planning area; and professional judgment. The plan will be completed in compliance with the FLPMA, NEPA, and all other applicable laws, regulations, and policies. Impacts from the management alternatives considered in the amended RMP will be analyzed in an EIS developed in accordance with regulations at 43 CFR 1610 and 40 CFR 1500.

The following preliminary criteria were developed internally for the WFO and presented for public comment. After public input is analyzed, the criteria become proposed criteria and can be added to or changed as the issues are addressed or as new information is presented. The WFO managers will approve the issues and criteria, along with any changes. Additional suggested criteria received in public scoping comments are described in **Section 4.2**, Additional Suggestions for Planning Criteria.

4.1 PRELIMINARY PLANNING CRITERIA

Any amendment to the WFO RMP will comply with FLPMA (43 United States Code 1701) and the BLM's land use planning regulations (43 CFR 1600).

Public participation would be encouraged throughout the process. The WFO managers and interdisciplinary team members will work cooperatively with the State of Nevada, tribal governments, county and municipal governments, other federal agencies, local resource advisory councils, appellants, affected permittees, and any other interested groups, agencies, and individuals.

- The EIS will comply with NEPA (42 United States Code 4332 et seq.) and its implementing regulations, as well as other Federal regulations.
- Any amendment to the WFO RMP will appropriately recognize the State's authority to manage wildlife and water.
- Any amendment to the WFO RMP will recognize valid existing rights.
- The State Historic Preservation Officer will be consulted under the National Historic Preservation Act and kept involved throughout the planning process, consistent with the National Programmatic Agreement (February 2012) and the State of Nevada Protocol Agreement between the BLM and State Historic Preservation Officer (revised February 2012). Integration of the public involvement provisions of the National Historic Preservation Act and NEPA will follow the guidance in Washington Office Instruction Memorandum 2012-108.
- The BLM will address transportation and access within the planning area, if appropriate, to meet the objectives identified for the proposed Eco-Sanctuary.
- Existing planning decisions in the WFO RMP not modified by this amendment would remain valid.
- All proposed management activities, including adjusting wild horse levels would be based upon current scientific information, and research and technology, as well as existing inventory and monitoring information.
- Adaptive management principles will be used in development of the plan amendment to provide management direction if additional actions or modified actions would be needed for the protection of wild horses or the sustainability of the land and its resources.

4.2 ADDITIONAL SUGGESTIONS FOR PLANNING CRITERIA

The BLM did not receive any additional suggestions for planning criteria for this RMP amendment/EIS.

CHAPTER 5

DATA SUMMARY/DATA GAPS

As part of the RMP amendment/EIS planning, evaluation, and data-collection process, the BLM has inventoried available information and has identified the following data needs:

- A Class I cultural resources survey is underway and is expected to be completed in December 2012. Issues and management considerations provided in this survey will be included in the RMP amendment/EIS. Where necessary, Class II and Class III surveys will also be completed.
- An invasive weeds study will be completed to assess the current extent of these weeds in the planning area.
- A land health assessment will be completed, the results of which will be used to determine the carrying capacity of the planning area.
- An inventory of lands with wilderness characteristics outside of Wilderness Study Areas will be conducted.
- A visual resources assessment will be conducted to identify sensitive visual receptors.
- Horse use patterns will be mapped. These patterns will be taken into account in analysis in the EIS.
- Vegetative community mapping will occur to assess the state of vegetation communities in the planning area.
- A range development inventory will be completed.

Both new data and existing resource information will be used in formulating management alternatives in the RMP amendment/EIS. To facilitate this process, information is being compiled and put into digital format for use in analysis and map production using Geographic Information Systems. Because this

information is imperative to quantify resources, update maps, and manipulate information during alternatives development, this process must be completed before analysis can begin. New data generated during the RMP amendment/EIS process will be used to address planning issues and will meet applicable established standards.

CHAPTER 6

FUTURE STEPS

6.1 SUMMARY OF FUTURE STEPS AND PUBLIC PARTICIPATION OPPORTUNITIES

The next phase of the BLM's planning process is to develop draft management alternatives based on the issues presented in **Sections 3.2**, Planning Issue Statements, and **3.3**, Summary of Public Comments by Resource Planning Issue Category, of this scoping report. These alternatives will address planning issues identified during scoping and will meet goals and objectives to be developed by the BLM's interdisciplinary team. In compliance with NEPA, Council on Environmental Quality regulations, and BLM planning regulations and guidance, alternatives should be reasonable and capable of implementation. The BLM will also meet with cooperating agencies, interested tribes, RACs, community groups, and individuals. A detailed analysis of the alternatives will be completed, and the BLM's preferred alternative will then be identified. The preferred alternative is often made up of a combination of management option components from various alternatives to provide the best mix and balance of multiple land and resource uses to resolve the issues.

The analysis of the alternatives will be documented in a Draft RMP Amendment/EIS. Although the BLM welcomes public input at any time during the planning process, the next official public comment period will begin when the Draft RMP Amendment/EIS is published, which is anticipated in 2013. The draft document will be widely distributed to elected officials, regulatory agencies, and members of the public, and it will be available on the project website (http://www.blm.gov/nv/st/en/fo/elko_field_office/blm_information/nepa/nenvwh_ecosanctuary.html). The availability of the draft document will be announced via a Notice of Availability in the *Federal Register*, and a 90-day public comment period will follow. Public meetings will be held throughout the project area during the 90-day comment period.

At the conclusion of the public comment period, the Draft RMP Amendment/EIS will be revised. A Proposed RMP Amendment/Final EIS will then

be published. The availability of the proposed document will be announced in the *Federal Register*, and a 30-day public protest period will follow regarding the proposed planning level decisions (43 CFR Part 1610.5.2). If necessary, a notice will be published in the *Federal Register* requesting comments on significant changes made as a result of protest. Concurrently, the Governor of Nevada will review the document for consistency with approved state and local plans, policies, and programs.

At the conclusion of the public protest period and the Governor's consistency review, the BLM will resolve all protests and any inconsistencies, and the approved RMP amendment (if any) and Record of Decision will be published. The availability of these documents will be announced in the *Federal Register*. Any implementation-level decisions in the RMP amendment, such as travel route designations, are not subject to the protest process but instead are subject to administrative remedies set forth in regulations applicable to the specific resource management program. These remedies generally take the form of appeals to the Office of Hearings and Appeals within 30 days of the effective date of the Record of Decision or in accordance with the provisions of 43 CFR 4.4.

All publications, including this report, newsletters, the Draft RMP Amendment/EIS, and the Notice of Availability, will be published on the Proposed Eco-Sanctuary website (http://www.blm.gov/nv/st/en/fo/elko_field_office/blm_information/nepa/nenvwh_ecosanctuary.html). In addition, pertinent dates regarding solicitation of public comments will be published on the website.

6.2 CONTACT INFORMATION

The public is invited and encouraged to participate throughout the planning process for the RMP amendment/EIS. Some ways to participate include:

- Reviewing the progress of the RMP amendment/EIS at the Proposed Eco-Sanctuary project website: http://www.blm.gov/nv/st/en/fo/elko_field_office/blm_information/nepa/nenvwh_ecosanctuary.html, which will be updated with information, documents, and announcements throughout the duration of the RMP amendment preparation; and
- Requesting to be added to the official project mailing list in order to receive future mailings and information. (e-mail EcoSanctuaryComments@blm.gov)

Anyone wishing to be added to or deleted from the distribution list, wishing to change their contact information, or requesting further information may email a request to EcoSanctuaryComments@blm.gov or contact Terri Dobis, Project Manager, BLM Elko District Office, Wells Field Office, 3900 E. Idaho Street, Elko, NV 89801, phone (775) 753-0290. Please provide name, mailing address, and e-mail address, as well as the preferred method to receive information.

CHAPTER 7

REFERENCES

BLM (US Department of the Interior, Bureau of Land Management). 1985. Wells Resource Management Plan. BLM, Wells Field Office, Elko, NV. July 16, 1985. 29 pp.

_____. 2005. Handbook H-1601-1—Land Use Planning Handbook. BLM, Washington, DC. March 11, 2005. 161 pp.

_____. 2008. Handbook H-17901—NEPA. BLM, Washington, DC. January 2008. 166 pp.

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Appendix A

Scoping Materials

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APPENDIX A

SCOPING MATERIALS

Public scoping for the Northeast Nevada Wild Horse Eco-Sanctuary RMP Amendment/EIS has included an interested public letter, three scoping open houses, a press release, and a public website, http://www.blm.gov/nv/st/en/fo/elko_field_office/blm_information/nepa/nenvwh_ecosanctuary.html. The formal public comment period, as required by NEPA, began on August 15, 2012, with the publication of a Notice of Intent in the *Federal Register*, and ended on September 19, 2012.

The following material is included in this appendix:

1. Notice of Intent
2. Press Release
3. Interested Public Letter
4. Scoping Comment Form

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Public Availability of Comments

Before including your address, phone number, email address, or other personal identifying information in your comment, you should be aware that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

Dated: July 26, 2012.

Joy E. Nicholopoulos,

Regional Director, Southwest Region.

[FR Doc. 2012-19891 Filed 8-14-12; 8:45 am]

BILLING CODE 4310-55-P

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[LLNVE030000.L10600000.DI0000 241A; 12-08807; MO# 4500035685; TAS: 14X1109]

Notice of Intent To Prepare an Environmental Impact Statement for Proposed Wild Horse Eco-Sanctuary in Elko County, Nevada, and an Associated Resource Management Plan Amendment for the Wells Field Office

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice of Intent.

SUMMARY: In compliance with the National Environmental Policy Act of 1969, as amended (NEPA), and the Federal Land Policy and Management Act of 1976, as amended, the Bureau of Land Management (BLM) Wells Field Office, Elko, Nevada, intends to prepare an Environmental Impact Statement (EIS) and an associated Resource Management Plan (RMP) amendment for a proposed privately operated wild horse eco-sanctuary and by this notice, is announcing the beginning of the scoping process to solicit public comments and identify issues.

DATES: This notice initiates the public scoping process for the EIS and associated RMP amendment. Comments on issues may be submitted until September 14, 2012. The date(s) and location(s) of any scoping meetings will be announced at least 15 days in advance through local news media, mailings to interested individuals, and the BLM Elko District Web site at: http://www.blm.gov/nv/st/en/fo/elko_field_office.html. In order to be included in the analysis, all comments must be received prior to the close of the 30-day scoping period or 15 days

after the last public meeting, whichever is later. The BLM will provide additional opportunities for public participation as appropriate.

ADDRESSES: You may submit comments on issues and planning criteria related to the EIS and RMP amendment by any of the following methods:

- *Email:*
EcoSanctuaryComments@blm.gov
- *Fax:* 775-753-0255
- *Mail:* Bureau of Land Management, Wild Horse Sanctuary RMP Amendment, Wells Field Office, 3900 E. Idaho Street, Elko, NV 89801

Documents pertinent to this proposal may be examined at the BLM Elko District Office, 3900 E. Idaho Street, Elko, Nevada, during regular business hours of 7:45 a.m. to 4:30 p.m., Monday through Friday, except holidays. Pertinent documents are also available on-line at: http://www.blm.gov/nv/st/en/fo/elko_field_office.html.

FOR FURTHER INFORMATION CONTACT: For further information or to have your name added to our mailing list, contact Judy May, resource assistant, BLM Wells Field Office, telephone: 775-753-0267; address: 3900 East Idaho Street, Elko, NV 89801; email: jmay@blm.gov. Persons who use a telecommunications device for the deaf (TDD) may call the Federal Information Relay Service (FIRS) at 1-800-877-8339 to contact the above individual during normal business hours. The FIRS is available 24 hours a day, 7 days a week, to leave a message or question with the above individual. You will receive a reply during normal business hours.

SUPPLEMENTARY INFORMATION: This document provides notice that the BLM Wells Field Office, Elko, Nevada, intends to prepare an EIS with an associated RMP amendment to the Wells RMP, and announces the beginning of the scoping process and seeks public input on issues and planning criteria. The planning area is located in Elko County, Nevada, and encompasses approximately 510,000 acres of public land. The organization Saving America's Mustangs (SAM) proposes to establish a privately operated eco-sanctuary to accommodate up to 900 non-reproducing wild horses (all one sex or sterilized) on a mixture of public and private lands in Elko County, Nevada, about 25 miles southeast of Wells. The proposed eco-sanctuary is in response to the BLM's request for applications for funding (Funding Opportunity L11AS0043) to assist in the development of a Wild Horse Partnership for an Eco-Sanctuary on Public and Private Land. Preliminarily, the BLM expects that the

EIS will address the impacts of the proposed eco-sanctuary and reasonable alternatives to that proposal, and an RMP amendment that may: (1) Adjust the boundaries and management objectives of existing wild horse herd management areas (HMAs) within or near the proposed eco-sanctuary; and (2) reduce and potentially eliminate livestock grazing within the portion of the Spruce Allotment east of Highway 93. The purpose of the public scoping process is to determine relevant issues that will influence the scope of the environmental analysis, including alternatives, and guide the process for developing the EIS. At present, the BLM has identified the following preliminary issues:

- (a) Potential effects to archaeological resources.
- (b) Potential effects to greater sage-grouse and other sensitive species.
- (c) Potential effects to important elk, mule deer, and other wildlife habitats.
- (d) Ability to meet standards for rangeland health.
- (e) Ability to manage healthy wild horse populations within the eco-sanctuary.
- (f) Ability to provide public access for recreational purposes.
- (g) Potential effects of reducing public lands available for livestock grazing.
- (h) Ability to manage non-reproducing herd.

Preliminary planning criteria for the RMP amendment include:

1. Any amendment to the Wells RMP will comply with FLPMA (43 U.S.C. 1701) and the BLM's land use planning regulations (43 CFR 1600).
2. Public participation would be encouraged throughout the process. The Wells Field Office managers and interdisciplinary team members will work cooperatively with the State of Nevada, tribal governments, county and municipal governments, other Federal agencies, local resource advisory councils, appellants, affected permittees, and any other interested groups, agencies, and individuals.
3. The EIS will comply with NEPA (42 U.S.C. 4332 *et seq.*) and its implementing regulations, as well as other Federal regulations.
4. Any amendment to the Wells RMP will appropriately recognize the State's authority to manage wildlife and water.
5. Any amendment to the Wells RMP will recognize valid existing rights.
6. The State Historic Preservation Officer (SHPO) will be consulted under the NHPA and kept involved throughout the planning process, consistent with the National Programmatic Agreement (February 2012) and the State of Nevada Protocol Agreement between the BLM

and SHPO (revised February 2012). Integration of the public involvement provisions of the NHPA and NEPA will follow the guidance in Washington Office Instruction Memorandum 2012-108.

7. The BLM will address transportation and access within the planning area, if appropriate, to meet the objectives identified for the eco-sanctuary.

8. Existing planning decisions in the Wells RMP not modified by this amendment would remain valid.

9. All proposed management activities, including adjusting wild horse levels would be based upon current scientific information, and research and technology, as well as existing inventory and monitoring information.

10. Adaptive management principles will be used in development of the plan amendment to provide management direction if additional actions or modified actions would be needed for the protection of wild horses or the sustainability of the land and its resources.

You may submit comments on issues and planning criteria in writing to the BLM at any public scoping meeting, or you may submit them to the BLM using one of the methods listed in the "ADDRESSES" section above. You should submit comments by the close of the 30-day scoping period or within 15 days after the last public meeting, whichever is later.

The BLM will utilize and coordinate the NEPA public participation requirements to assist the agency in satisfying the public involvement requirements under Section 106 of the National Historic Preservation Act (NHPA) (16 U.S.C. 470f) pursuant to 36 CFR 800.2(d)(3). The information about historic and cultural resources within the area potentially affected by the proposed action will assist the BLM in identifying and evaluating impacts to such resources in the context of both NEPA and Section 106 of the NHPA.

The BLM will consult with Indian tribes on a government-to-government basis in accordance with Executive Order 13175 and other policies. Tribal concerns, including impacts on Indian trust assets and potential impacts to cultural resources, will be given due consideration. Federal, State, and local agencies, along with tribes and other stakeholders that may be interested in or affected by the proposed action that the BLM is evaluating, are invited to participate in the scoping process and, if eligible, may request or be requested by the BLM to participate in the

development of the environmental analysis as a cooperating agency.

Before including your address, phone number, email address, or other personal identifying information in your comment, you should be aware that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

The minutes and list of attendees for each scoping meeting will be available to the public and open for 30 days after the meeting to any participant who wishes to clarify the views he or she expressed.

The BLM will evaluate identified issues to be addressed in the plan, and will place them into one of three categories:

1. Issues to be resolved in the plan amendment;
2. Issues to be resolved through policy or administrative action; or
3. Issues beyond the scope of this plan amendment.

The BLM will provide an explanation in the Draft EIS as to why an issue was placed in category two or three. The public is also encouraged to help identify any management questions and concerns that should be addressed in the plan. The BLM will work collaboratively with interested parties to identify the management decisions that are best suited to local, regional, and national needs and concerns.

The BLM will use an interdisciplinary approach to develop the plan amendment in order to consider the variety of resource issues and concerns identified. Specialists with expertise in the following disciplines will be involved in the planning process: Wild horse and burro, rangeland management, outdoor recreation, archaeology, wildlife and fisheries, lands and realty, hydrology, soils, sociology, and economics.

Authority: 40 CFR 1501.7 and 43 CFR 1610.2.

Bryan K. Fuell,
Manager,

Wells Field Office.
[FR Doc. 2012-20022 Filed 8-14-12; 8:45 am]

BILLING CODE 4310-HC-P

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[LLIDI02000-L16100000-DR0000-LXSS050D0000]

Notice of Availability of Record of Decision for the Pocatello Field Office Resource Management Plan/ Environmental Impact Statement

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice of availability.

SUMMARY: The Bureau of Land Management (BLM) announces the availability of the Record of Decision (ROD)/Approved Resource Management Plan (RMP) for the Pocatello Field Office located in southeastern Idaho. The Idaho State Director signed the ROD on July 10, 2012, which constitutes the final decision of the BLM and makes the Approved RMP effective immediately.

ADDRESSES: Copies of the ROD/ Approved RMP are available upon request from the Field Manager, Pocatello Field Office, Bureau of Land Management, 4350 Cliffs Drive, Pocatello, Idaho 83204 or at the following Web site: http://www.blm.gov/id/st/en/fo/pocatello/planning/pocatello_resource.html. Copies of the ROD/Approved RMP are available for public inspection at the Pocatello Field Office at the above address and the Idaho State Office at 1387 S. Vinnell Way, Boise, Idaho 83709.

FOR FURTHER INFORMATION CONTACT: David Pacioretty, Field Manager, Bureau of Land Management, Pocatello Field Office; telephone 208-478-6340; address 4350 Cliffs Drive, Pocatello, Idaho 83204; email:

id_pocatello_fo@blm.gov. Persons who use a telecommunications device for the deaf (TDD) may call the Federal Information Relay Service (FIRS) at 1-800-877-8339 to contact the above individual during normal business hours. The FIRS is available 24 hours a day, 7 days a week, to leave a message or question with the above individual. You will receive a reply during normal business hours.

SUPPLEMENTARY INFORMATION: The approved RMP was developed with public participation through a collaborative planning process in accordance with the Federal Land Policy and Management Act of 1976, as amended, and the National Environmental Policy Act of 1969, as amended. The Approved RMP addresses management of resources and resource uses on approximately 618,300 acres of public land in the Pocatello Field Office

BLM Nevada News

ELKO DISTRICT OFFICE NO. 2012-058

FOR RELEASE: Wednesday, Aug. 15, 2012

CONTACT: Lesli Ellis (775) 753-0386; email: lellis@blm.gov

BLM Begins Process to Analyze Proposed Northeast Nevada Wild Horse Eco-Sanctuary

ELKO, Nev. – The Bureau of Land Management (BLM) has published in the *Federal Register* a Notice of Intent to prepare an Environmental Impact Statement to analyze the potential impacts of the proposed Northeast Nevada Wild Horse Eco-Sanctuary.

The proposal is to create a wild horse eco-sanctuary of a non-reproductive herd on most of the existing Spruce Grazing Allotment, including about 14,000 acres of private land and 508,000 acres of public land, approximately 25 miles southeast of Wells, Nev. The Notice of Intent opens a 30-day public scoping period that will end Sept. 14, 2012 or 15 days after the last public scoping open house.

Open houses, where representatives will be on hand to answer questions, are scheduled for 6 to 8 p.m. at the following dates and locations:

Aug. 29

Wells City Hall

525 6th Street

Wells, Nev. 89835

Aug. 30

Hyatt Place, Reno – Meeting Room 1

1790 East Plumb Lane

Reno, Nev. 89502

Sept. 4

Elko Convention Center – Cedar Room

700 Moran Way

Elko, Nev. 89801

Authorizing the proposal could 1) restructure the three wild horse herd management areas within the project area and 2) remove a portion of the Spruce Allotment from the N1 Grazing District. Both actions would require an amendment to the 1985 Wells Resource Management Plan.

The public is being asked to identify issues relevant to the preparation of an EIS for the proposed eco-sanctuary and the possible plan. The wild horse eco-sanctuary would be operated by Saving America's Mustangs, a non-profit group, which has purchased the Spruce Ranch and acquired the associated grazing permit in the Spruce Allotment. The proponent also seeks to develop an eco-tourism operation in conjunction with the wild horse eco-sanctuary.

The BLM has identified preliminary issues to include

- Potential effects to archaeological resources
- Potential effect to Greater sage-grouse and other sensitive species
- Potential effects to important elk, mule deer and other wildlife habitats
- Ability to manage healthy wild horse populations
- Ensure public access for recreational purposes

BLM is asking, as part of the scoping effort, for the public to submit any suggestions for consideration, and any and all information that would help provide for a thorough and accurate analysis.

Interested individuals should send written comments to the BLM Elko District Office, Wells Field Office, 3900 E. Idaho Street, Elko, NV 89801, Attn: Wild Horse Eco-Sanctuary, or fax at (775) 753-0385. Comments may also be submitted to the project e-mail address: EcoSanctuaryComments@blm.gov.

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment – including your personal identifying information – may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

Additional information is available online at: www.blm.gov/rv5c.

-BLM-



United States Department of the Interior



BUREAU OF LAND MANAGEMENT

Elko District Office
3900 East Idaho Street
Elko, Nevada 89801
<http://on.doi.gov/elkoBLM>

In Reply Refer To:
4130/4710/1610(NVE03000)

AUG 15 2012

Dear Interested Public,

The Bureau of Land Management (BLM), Wells Field Office, has published in the *Federal Register* a Notice of Intent to prepare an Environmental Impact Statement to analyze the potential impacts of the proposed Northeast Nevada Wild Horse Eco-Sanctuary. The Notice of Intent opens a 30-day public scoping period that will end September 14, 2012 or 15 days after the last public scoping open house, whichever is later.

Please see the enclosed press release for the dates, times and locations of the scoping open houses; how to submit comments and suggestions; and where to obtain additional information about the proposed Northeast Nevada Wild Horse Eco-Sanctuary.

Written comments should be sent to the BLM Elko District Office, Attn: Wild Horse Eco-Sanctuary, 3900 E. Idaho Street, Elko, NV 89801, or faxed to (775) 753-0385. Comments may also be submitted to the project e-mail address: EcoSanctuaryComments@blm.gov.

If you have any questions or need further assistance, please contact me at (775)753-0290 or Lesli Ellis, Public Affairs Officer, at (775)753-0386.

Sincerely,

Terri Dobis
Project Manager
Wells Field Office

Enclosure

cc:
ANIMAL WELFARE INSTITUTE
CALLAN W. PAYTON
STEVEN A. & DANIEL S. CHOURNOS
CONGRESSMAN MARK AMODEI
DBA NEED MORE SHEEP COMPANY
DIXIE VALLEY CATTLE, LLC
EGBERT, F. SCOTT AND LAUREL S.
H&R LIVESTOCK
HOOTS, DAN

LEAR, KAY & MARY
MARTHA P. HOOTS
METROPOLITAN LIFE INSURANCE COMPANY
NEVADA STATE BOARD OF SHEEP COMMISSIONERS
NEVADA DEPARTMENT OF WILDLIFE
NEVADA FARM BUREAU FEDERATION
NEVADA WOOL GROWERS ASSOCIATION
ROCHE, JEFF O.
SAVING AMERICA'S MUSTANGS
SHERIE RAE GORING
SORENSEN, VON L. & MARIAN
SUSTAINABLE GRAZING ASSOCIATION
TOMMY, LLC
US FISH & WILDLIFE SERVICE
US SENATOR DEAN HELLER
WESTERN WATERSHEDS PROJECT
WOOD HILLS RANCHING, LLC
ANIMAL RESCUE NETWORK INTERNATIONAL
CARL SLAGOWSKI
FRIENDS OF NEVADA WILDERNESS
NATURAL RESOURCES MANAGEMENT ADVISORY COMMISSION
NEVADA CATTLEMEN'S ASSOCIATION
STATE OF NEVADA CLEARING HOUSE
KEN CONLEY
CONNIE J. CUMMINGHAM
EASTERN NEVADA LANDSCAPE COALITION
EDGINGTON, CHAD & CHILD, ROBERT
FLAT TOP SHEEP CO.
IN DEFENSE OF ANIMALS
JACK & IRENE WALTHER
KENNETH JONES
WESLEY BOWLEN
WHITE PINE CO. COMMISSIONERS
ELKO COUNTY BOARD OF COUNTY COMMISSIONERS
NEVADA DEPARTMENT OF WILDLIFE
JIM WEST
WILD HORSE SPIRIT
KATHY GREGG
RESOURCE CONCEPTS, INC.
THERESA MINOLITTI
EUREKA COUNTY DEPARTMENT OF NATURAL RESOURCES
JIM BAUMANN
SENATOR DEAN RHOADS
WILD HORSE SANCTUARY
BROUGH PARTNERSHIP
IL RANCH

JOHN CARPENTER
MORI RANCHES, LLC
THE CLOUD FOUNDATION
BARBARA WARNER
CRAIG C. DOWNER
DOUBLE U LIVESTOCK, LLC
WILDEARTH GUARDIANS
CITY OF WELLS
CITY OF ELKO
BLM MOUNT LEWIS FIELD OFFICE
BLM ELY DISTRICT OFFICE

BLM Nevada News

ELKO DISTRICT OFFICE NO. 2012-058

FOR RELEASE: Wednesday, Aug. 15, 2012

CONTACT: Lesli Ellis (775) 753-0386; email: lellis@blm.gov

BLM Begins Process to Analyze Proposed Northeast Nevada Wild Horse Eco-Sanctuary

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The proposal is to create a wild horse eco-sanctuary of a non-reproductive herd on most of the existing Spruce Grazing Allotment, including about 14,000 acres of private land and 508,000 acres of public land, approximately 25 miles southeast of Wells, Nev. The Notice of Intent opens a 30-day public scoping period that will end Sept. 14, 2012 or 15 days after the last public scoping open house.

Open houses, where representatives will be on hand to answer questions, are scheduled for 6 to 8 p.m. at the following dates and locations:

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525 6th Street

Wells, Nev. 89835

Aug. 30

Hyatt Place, Reno – Meeting Room 1

1790 East Plumb Lane

Reno, Nev. 89502

Sept. 4

Elko Convention Center – Cedar Room

700 Moran Way

Elko, Nev. 89801

Authorizing the proposal could 1) restructure the three wild horse herd management areas within the project area and 2) remove a portion of the Spruce Allotment from the N1 Grazing District. Both actions would require an amendment to the 1985 Wells Resource Management Plan.

The public is being asked to identify issues relevant to the preparation of an EIS for the proposed eco-sanctuary and the possible plan. The wild horse eco-sanctuary would be operated by Saving America's Mustangs, a non-profit group, which has purchased the Spruce Ranch and acquired the associated grazing permit in the Spruce Allotment. The proponent also seeks to develop an eco-tourism operation in conjunction with the wild horse eco-sanctuary.

The BLM has identified preliminary issues to include

- Potential effects to archaeological resources
- Potential effect to Greater sage-grouse and other sensitive species
- Potential effects to important elk, mule deer and other wildlife habitats
- Ability to manage healthy wild horse populations
- Ensure public access for recreational purposes

BLM is asking, as part of the scoping effort, for the public to submit any suggestions for consideration, and any and all information that would help provide for a thorough and accurate analysis.

Interested individuals should send written comments to the BLM Elko District Office, Wells Field Office, 3900 E. Idaho Street, Elko, NV 89801, Attn: Wild Horse Eco-Sanctuary, or fax at (775) 753-0385. Comments may also be submitted to the project e-mail address: EcoSanctuaryComments@blm.gov.

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment – including your personal identifying information – may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

Additional information is available online at: www.blm.gov/rv5c.

-BLM-

Bureau of Land Management
Elko District
Scoping Comment Card
Northeast Nevada Wild Horse Eco-Sanctuary



Date: _____

Please check your affiliation below:

<input type="checkbox"/> Individual	<input type="checkbox"/> Private Organization
<input type="checkbox"/> Federal, State or Local Government	<input type="checkbox"/> Citizen's Group
<input type="checkbox"/> Elected Representative	<input type="checkbox"/> Regulatory Agency

Name: _____

Organization (if applicable): _____

Street Address : _____

City/State/Zip: _____

Email Address: _____

Would you like to be added to the interested party list? Y/N Is email sufficient? Y/N

If you wish to provide written comments, please write your comments below. Written comments may be submitted using this card, an e-mail to EcoSanctuaryComments@blm.gov, or any other written format provided to the BLM.

Comments: _____

Please provide your comments to a BLM member or place a stamp on reverse and mail.

Bureau of Land Management
Elko District
Scoping Comment Card
Northeast Nevada Wild Horse Eco-Sanctuary



Date: _____

Please check your affiliation below:

<input type="checkbox"/> Individual	<input type="checkbox"/> Private Organization
<input type="checkbox"/> Federal, State or Local Government	<input type="checkbox"/> Citizen's Group
<input type="checkbox"/> Elected Representative	<input type="checkbox"/> Regulatory Agency

Name: _____

Organization (if applicable): _____

Street Address: _____

City/State/Zip: _____

Email Address: _____

Would you like to be added to the interested party list? Y/N Is email sufficient? Y/N

If you wish to provide written comments, please write your comments below. Written comments may be submitted using this card, an e-mail to EcoSanctuaryComments@blm.gov, or any other written format provided to the BLM.

Comments: _____

Please provide your comments to a BLM member or place a stamp on reverse and mail.

Bureau of Land Management
Elko District
Attn: Eco-Sanctuary Comments
3900 E. Idaho St.
Elko, NV 89801

Bureau of Land Management
Elko District
Attn: Eco-Sanctuary Comments
3900 E. Idaho St.
Elko, NV 89801

Appendix B

List of Commenters

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APPENDIX B

LIST OF COMMENTERS

The formal public comment period, as required by NEPA, began on August 15, 2012, with the publication of a Notice of Intent in the *Federal Register*, and ended on September 19, 2012. **Table B-1**, Commenters, lists the names, affiliations, and locations of those who submitted written comments to the BLM for the Northeast Nevada Wild Horse Eco-Sanctuary RMP Amendment/EIS as part of the public scoping process. All comments received on or before September 19, 2012, were included in this scoping report. The commenters are listed in chronological order of when their comments were received. Form letter submissions are not included in Table B-1. **Table B-2**, Form Letter Submissions, includes a brief description of the form letters received, including the number of letters received.

**Table B-1
Commenters**

	Commenter Name		Affiliation	City	State	Date Received (MM/DD/YY)
	First	Last				
State Government Agency						
1.	Alan	Jenne	NV Dept. of Wildlife	Reno	NV	09/17/2012
Local Government Agency						
2.	Wes	Henderson	Nevada Association of Counties		NV	08/29/2012
3.	R. Jeff	Williams	Elko County Board of Commissioners	Elko	NV	09/14/2012
Business/Commercial Sector						
4.	Jon	Hill	Cripple Cowboy Cow Outfit, Inc.	Rangely	CO	08/25/2012
5.	Kenneth	Jones	TI Ranches LLC	Lamoille	NV	08/30/2012
6.	Roger	Bowers	Taylor Western Resources, LLC	Ely	NV	09/18/2012
7.	Roger	Bowers	Cardigan-West Resources LLC	Ely	NV	09/18/2012
Organization (non-profit, citizen's group)						
8.	Sandy	Malyuzka	Hidden Valley Wild Horse	Reno	NV	09/06/2012
9.	Shirley	Vittorino	Hidden Valley Wild Horse Protection	Reno	NV	09/09/2012
10.	Unknown	Form Letter				09/13/2012
11.	Theodora	Dowling	Public Lands Council/National Cattleman's Beef Association			09/14/2012
12.	Doug	Busselman	Nevada Farm Bureau	Sparks	NV	09/14/2012
13.	Katie	Fite	Western Watersheds Project	Boise	ID	09/16/2012
14.	Mark	Salvo	WildEarth Guardians	Phoenix	AZ	09/17/2012
15.			Change.org			09/17/2012
16.	Elyse	Gardner	DreamCatcher Wild Horse & Burro Sanctuary	Ravendale	CA	09/18/2012
17.	Suzanne	Roy	American Wild Horse Preservation Campaign			09/18/2012
18.	Deborah	Dubow Press	ASPCA	Washington	DC	09/18/2012
19.	Paul	Schlegel	American Farm Bureau Federation			09/18/2012
20.	Dennis	Foster	Masters of the Fox Hounds Association			09/18/2012

**Table B-1
Commenters**

	Commenter Name		Affiliation	City	State	Date Received (MM/DD/YY)
	First	Last				
21.	Mark	Truax	National Association of Conservation Districts			09/18/2012
22.	Dustin	Van Liew	National Cattlemen's Beef Association			09/18/2012
23.	Susan	Recce	National Rifle Association			09/18/2012
24.	Desiree	Sorenson-Groves	National Wildlife Refuge Association			09/18/2012
25.	Dustin	Van Liew	Public Lands Council			09/18/2012
26.	Tom	Allen	Public Lands Foundation			09/18/2012
27.	Jess	Peterson	Society for Range Management			09/18/2012
28.	Cliff	Gardner	Rural Heritage Preservation Project	Ruby Valley	NV	09/18/2012
29.	Julie	Gleason	Mojave-Southern Great Basin RAC			09/19/2012
30.	Karen	Sussman	International Society for the Protection of Mustangs and Burros	Lantry	SD	09/19/2012
31.	Desiree	Seal	Nevada Cattlemen's Association	Elko	NV	09/19/2012
32.	Ginger	Kathrens	The Cloud Foundation	Colorado Springs	CO	09/19/2012
33.			American Wild Horse Preservation Campaign			09/19/2012
34.	Steve	Boies	N-I Grazing Board	Wells	NV	09/20/2012
Individual						
35.	Lynda	Sanford		Wellington	NV	08/16/2012
36.	Debbie	Coffey				08/17/2012
37.	Vanessa	Register		Yucaipa	CA	08/17/2012
38.	Joanne	Spencer				08/18/2012
39.	Kandy	Hill				08/18/2012
40.	Denise	DeLucia			NV	08/18/2012
41.	Cindi	Eveleigh		Sun City	AZ	08/18/2012
42.	Margaret					08/21/2012
43.	Marianne	Fazzina				08/29/2012

**Table B-1
Commenters**

	Commenter Name		Affiliation	City	State	Date Received (MM/DD/YY)
	First	Last				
44.	Ruth	Pearl				08/29/2012
45.	Nancy	Sharmer		Fresno	CA	08/31/2012
46.	Susan	Sarles				09/01/2012
47.	Donald	Molde		Reno	NV	09/03/2012
48.	Elizabeth	Dyer		Spring Creek	NV	09/04/2012
49.	Cherith	Dyer		Spring Creek	NV	09/04/2012
50.	Peggy	Conroy		West Chazy	NY	09/06/2012
51.	Mona	Armenta		Reno	NV	09/09/2012
52.	Casey	Schmidt				09/09/2012
53.	Thomas	Lund		Douglas County	NV	09/10/2012
54.	Diane	Adams				09/11/2012
55.	Jane					09/11/2012
56.	Marta	Williams				09/11/2012
57.	Sarah	Reid		Santa Rosa	CA	09/11/2012
58.	Kathy	Grossman		Chatsworth	CA	09/12/2012
59.	Sharon	Call				09/12/2012
60.	Sandee	Force		Junction City	OR	09/12/2012
61.	Jill	Whitt				09/12/2012
62.	Judy	Berube		Warwick	RI	09/12/2012
63.	Kathleen	O'Sullivan		Bumpass	VA	09/12/2012
64.	Sue	Sefscik		Dunnellon	FL	09/12/2012
65.	Colleen	Sayre		Glide	OR	09/12/2012
66.	Sheryl	Lashway		Galveston	TX	09/12/2012
67.	Alex	Lester		Toronto, Ontario		09/12/2012

**Table B-1
Commenters**

	Commenter Name		Affiliation	City	State	Date Received (MM/DD/YY)
	First	Last				
68.	Lynette	Dumont		Golden	CO	09/12/2012
69.	Lynne	Layne		Huntsville	AL	09/12/2012
70.	Linda	Hanick		Estes Park	CO	09/12/2012
71.	Margaret	Lewis		Sausalito	CA	09/12/2012
72.	Barbara	Boros		Santa Barbara	CA	09/12/2012
73.	Bonita	Young		Spring Creek	NV	09/12/2012
74.	Faye	Higbee		Post Falls	ID	09/12/2012
75.	Lydia	McNeese		Lake City	CO	09/12/2012
76.	Dawn	Corby		Halifax	MA	09/12/2012
77.	Darcy	Grizzle		Las Vegas	NV	09/12/2012
78.	Arlene	Ukeiley		Las Vegas	NV	09/12/2012
79.	Terry	Nason		Guess	NJ	09/12/2012
80.	Marcia	Witte		Rancho Santa Margarita	CA	09/12/2012
81.	J.L.	Sisk		Mooresville	IN	09/12/2012
82.	Bonni	Nicholson		Beaumont	CA	09/12/2012
83.	Carol	Kracht		Escalante	UT	09/12/2012
84.	Kelly	Gottesman		Greer	SC	09/12/2012
85.	Robert	Billet		Glen Rock	PA	09/12/2012
86.	Elissa	Kline		Santa Cruz	CA	09/12/2012
87.	Joanne	Hesselink		Neshkoro	WI	09/12/2012
88.	Susan	Purcell		Livingston	TX	09/12/2012
89.	Ana	Salinas		Austin	TX	09/12/2012
90.	Donna	Buscemi		Street	MA	09/12/2012
91.	Courtney	Stewart		Texarkana	TX	09/12/2012

**Table B-1
Commenters**

	Commenter Name		Affiliation	City	State	Date Received (MM/DD/YY)
	First	Last				
92.	Elizabeth	Ralph		San Diego	CA	09/12/2012
93.	J.	Capozzelli		New York	NY	09/12/2012
94.	Vivianne	Mosca-Clark		Williams	OR	09/12/2012
95.	Maggie	Frazier		Windsor	NY	09/12/2012
96.	Karen	Gleason		Nashua	NH	09/12/2012
97.	Yovonne	Autrey-Schell		Ocean Shores	WA	09/12/2012
98.	Linda	Redman		West Hollywood	CA	09/12/2012
99.	Emily	Pompei		Virginia Beach	VA	09/12/2012
100.	Sally	Lowell		Jacksonville	OR	09/12/2012
101.	Dionne	Brooks		Kailua Kona	HI	09/12/2012
102.	Kim	Cavanagh		Broomfield	CO	09/12/2012
103.	Susan	Rolfe		Petaluma	CA	09/12/2012
104.	John	Tyburczy				09/12/2012
105.	Mary	B				09/12/2012
106.	Daniel	Rathbun		Las Cruces	NM	09/12/2012
107.	Paul	Bottari				09/13/2012
108.	Diane and Syd	Marcus				09/13/2012
109.	Helene	Mowka		Rainbow Lake	NY	09/13/2012
110.	Pat	Wolph		Silver City	NM	09/13/2012
111.	Janet	Stafford		Winthrop	ME	09/13/2012
112.	Deanna	Rowan		Chapel Hill	NC	09/13/2012
113.	Coralee	Popp		Madras	OR	09/13/2012
114.	Carrie	Peterson		Suite 201	CA	09/13/2012
115.	Lynn	Snyder		Vestal	NY	09/13/2012

**Table B-1
Commenters**

	Commenter Name		Affiliation	City	State	Date Received (MM/DD/YY)
	First	Last				
116.	Robert	Fleck		Santa Clarita	CA	09/13/2012
117.	Sandy	Baker		Alvarado	TX	09/13/2012
118.	Judy	Haile				09/13/2012
119.	Dona					09/13/2012
120.	Wanda	Gonzalez				09/13/2012
121.	Janis	Keller		Pembroke Pines	FL	09/13/2012
122.	Nancy	Kerson		Napa	CA	09/13/2012
123.	Barbara	Leonard		Seymour	MO	09/14/2012
124.	Terry	Steinberger				09/14/2012
125.	Kathleen	Hayden		Baker	NV	09/14/2012
126.	Rene	B				09/14/2012
127.	Mona	EL Baradie		Switzerland		09/14/2012
128.	Tina	Nappe				09/14/2012
129.	Craig	Downer		Minden	NV	09/14/2012
130.	Roxy	Trahan		Saucier	MS	09/15/2012
131.	Michele	Johnson		Slidell	LA	09/15/2012
132.	Linda	Almeida		Deep River	CT	09/15/2012
133.	Linda	Juliano		Bedford	MA	09/15/2012
134.	Robin and Steve	Boies		Wells	NV	09/15/2012
135.	Judy	Maxwell				09/16/2012
136.	Rhonda	Lanier		Oceanside	CA	09/16/2012
137.	Robert	Bauer				09/16/2012
138.	Margaret	Southwell		Fanwood	NJ	09/16/2012
139.	S.	Urton		East Stroudsburg	PA	09/16/2012

**Table B-1
Commenters**

	Commenter Name		Affiliation	City	State	Date Received (MM/DD/YY)
	First	Last				
140.	Connie	Brady		Las Vegas	NV	09/16/2012
141.	Crystal	Schul		Duncanville	TX	09/17/2012
142.	Denise	Brown		Portsmouth	NH	09/17/2012
143.	Sheila	Roberson				09/17/2012
144.	Terry	Halvorson				09/17/2012
145.	Kim	Hutchison		Hampton Bays	NY	09/17/2012
146.	Sharon	Cheape		Wahiawa	HI	09/17/2012
147.	Sonja	Conatser		Jamestown	TN	09/17/2012
148.	Carol	Walker		Longmont	CO	09/17/2012
149.	Sheila	Roberson				09/17/2012
150.	Sharol	Huckaba		Las Vegas	NV	09/17/2012
151.	Amanda	Rudisill		Olympia	WA	09/17/2012
152.	Rosemary	Trosper		Thousand Oaks	CA	09/17/2012
153.	Laurie	Jackson		Alabaster	AL	09/17/2012
154.	Rose	Stickland				09/17/2012
155.	Bonnie	Kohleriter		Alamo	CA	09/17/2012
156.	Laura	Campbell				09/17/2012
157.	Casey	Anderson		Saint George	UT	09/17/2012
158.	Kathy	Leonard				09/18/2012
159.	Robynne	Catheron		Oxford	NY	09/18/2012
160.	Susan	Johnson				09/18/2012
161.	Ann	Lawrence		Littleton	MA	09/18/2012
162.	Suzanne	Moore				09/18/2012
163.	Eileen	Hennessy		Melrose	MA	09/18/2012
164.	Lauren	Jackson				09/18/2012

**Table B-1
Commenters**

	Commenter Name		Affiliation	City	State	Date Received (MM/DD/YY)
	First	Last				
165.	Lorna	Bryce				09/18/2012
166.	Ralph	Sacrison		Elko	NV	09/18/2012
167.	Nancy	Babcock		Healdsburg	CA	09/18/2012
168.	Robert	Hillery		Stratham	NH	09/18/2012
169.	Janet	Schultz				09/18/2012
170.	Carla	Bowers		Volcano	CA	09/18/2012
171.	Brendon	Walker				09/18/2012
172.	Cindi	Silva				09/18/2012
173.	Kimberly	Kinsey		Canada		09/18/2012
174.	Ginger	Casey		Santa Fe	NM	09/18/2012
175.	Maggie	Frazier		Windsor	NY	09/18/2012
176.	Kerry	Hart		Elko County	NV	09/18/2012
177.	Gloria	Argos		Ioannina, Greece		09/18/2012
178.	Marlow	Dahl				09/18/2012
179.	Terri	Paxton				09/18/2012
180.	Sue	Kelly				09/18/2012
181.	Susan	Sutherland		West Chicago	IL	09/18/2012
182.	Felicia	Segura				09/18/2012
183.	Kate	Beardsley		Bend	OR	09/19/2012
184.	Erin	Smith				09/19/2012
185.	Brenda	Geier				09/19/2012
186.	Bruce	Ullman				09/19/2012
187.	Jan	Kerr				09/19/2012
188.	Susan	Burns		Santa Fe	NM	09/19/2012
189.	Arla	Ruggles		White Pine	NV	09/19/2012

**Table B-1
Commenters**

	Commenter Name		Affiliation	City	State	Date Received (MM/DD/YY)
	First	Last				
				County		
190.	Winnie	Wong		San Francisco	CA	09/19/2012
191.	Kathy	Gregg				09/19/2012
192.	Laura	Leigh		Carson City	NV	09/19/2012
193.	Marybeth	Devlin		Miami	FL	09/19/2012
194.	Sandra	Bryan		Burnsville	NC	09/19/2012
195.	Kathleen	Wattle				09/19/2012
196.	Chris	Posey		Ft. Washington	PA	09/19/2012
197.	Dominique	Landis				09/19/2012
198.	Sherry	Oster		Cottonwood	CA	09/19/2012
199.	Angela	Miller-Valianos		Cortland	IL	09/19/2012
200.	Cynthia	Simon		Gorham	ME	09/19/2012
201.	Susan Borison	Rodriquez				09/19/2012
202.	Pat	Dewar		Great Falls	MT	09/21/2012
203.	Anna	Catherman				09/21/2012
204.	Kaye	Killgore		Portland	OR	10/05/2012

**Table B-2
Form Letter Submissions**

Date First Letter Received (Month/Day/Year)	Organization Identified (if any)	Description of Form Letter Contents	Number Received	Number of Form Letters with at Least One Unique Comment
09/11/2012	American Wild Horse Preservation Campaign	Wild horse advocate letter expressing support for the proposed Eco-Sanctuary as long as it would not negatively impact existing HMAs in the area and would not convert free-roaming populations or portions of populations to a non-reproducing herd.	2,876	125 ¹
09/12/2012	American Wild Horse Preservation Campaign	Wild horse advocate letter expressing support for the proposed Eco-Sanctuary as long as it would not negatively impact existing HMAs in the area and would not convert free-roaming populations or portions of populations to a non-reproducing herd.	562	125 ¹
09/12/2012	American Wild Horse Preservation Campaign	Wild horse advocate letter expressing support for the proposed Eco-Sanctuary as long as it would not negatively impact existing HMAs in the area and would not convert free-roaming populations or portions of populations to a non-reproducing herd.	191	125 ¹
09/17/2012	Change.org	Wild horse advocate letter opposing altering wild horse herds by removing mares and gelding stallions.	6	2
09/12/2012		Wild horse advocate letter opposing removing mares and gelding stallions from the three existing HMAs overlapping the proposed Eco-Sanctuary.	3	0

¹Due to the similarities between the content of these three form letters, the number of letters with unique comments was combined for all three form letters.

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Appendix C

Comments by Resource Planning Issue

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APPENDIX C

COMMENTS BY RESOURCE PLANNING ISSUE

The BLM received a total of 710 discrete comments during the Northeast Nevada Wild Horse Eco-Sanctuary RMP Amendment/EIS scoping period. These comments were classified by process category and by planning issue. Comments for each process category and for planning issue category are included in this appendix. Comments are included verbatim from the comment letters; however, information in letters that was not considered a comment is not included here. Comments pertaining to multiple planning issue categories are included in each category. Comment letters can be viewed in their entirety at the Elko District Office in Elko, Nevada. Comments are included for the following groups:

Comments by Process Category:

Table C-1, General Comments Outside the Scope of the RMP Amendment/EIS

Table C-2, Comments Related to Issues to Be Solved by National Policy

Comments by Planning Issue:

Table C-3, General Comments Related to the RMP Amendment/EIS

Issue 1: Wild Horse Management

Table C-4.A, Comments Related to Wild Horse Management – General

Table C-4.B, Comments Related to Wild Horse Capture and Long-term Holding

Table C-4.C, Comments Related to Wild Horse Reproduction and Family Units

Table C-4.D, Comments Related to Wild Horse HMA Boundaries and Existing Populations

Issue 2: Water Quality and Access

Table C-5.A, Comments Related to Water Resources

Table C-5.B, Comments Related to Fencing

Issue 3: Livestock Grazing

Table C-6, Comments Related to Livestock Grazing

Issue 4: Land Health Standards and Forage

Table C-7.A, Comments Related to Vegetation, Including Riparian and Wetland Areas and Noxious Weeds

Table C-7.B, Comments Related to Rangeland Health Effects of Wild Horses

Table C-7.C, Comments Related to Wildlife – General

Issue 5: Tourism and Socioeconomics

Table C-8, Comments Related to Tourism and Socioeconomics

Issue 6: Recreation

Table C-9.A, Comments Related to Recreation

Table C-9.B, Comments Related to Transportation and Travel Management

Issue 7: Special Status Species

Table C-10, Comments Related to Special Status Species

Issue 8: Mining and Mineral Rights

Table C-11, Comments Related to Mining and Mineral Rights

Issue 9: Cultural Resources

Table C-12, Comments Related to Cultural Resources

Issue 10: Vegetation Treatment and Habitat Restoration

Table C-13, Comments Related to Conflicts with Other Projects in the Planning Area

Issue 11: Special Management Areas

Table C-14, Comments Related to Special Management Areas

Table C-1
General Comments Outside the Scope of the RMP Amendment/EIS

Comment No.	Comment	Cmt Ltr Code
1.	In BLM-speak, "restoration" sadly means the opposite. It means radical disturbance and destruction of native forests, sagebrush and wild lands, and the accompanying loss of habitat security for the habitats the woody vegetation provides in order to try to produce grass. In this instance, BLM has revived a project proposed long ago by the Sorenson cattle operation and NDOW seeking to placate that rancher. There have already been large crested wheat seedings that destroyed critical pygmy rabbit and sage-grorse habitats. BLM's current proposal is now using claims that destroying wild land forests will promote mule deer habitat. The facts are that the deer winter in Spruce because it has the necessary habitat components right now that they need. The Spruce Veg Project would destroy, alter and fragment these very components - especially when coupled with road blading from the treatments and the Travel process which is still not completed.	emc0006
2.	The aggressive Veg treatments will have a very large negative impact. The will cause hotter, drier sites and promote flammable cheatgrass invasion and weeds. It will make wildlife and wild horses much more vulnerable to human disturbance. It threatens species ranging from pinyon jay to ferruginous hawk to pygmy rabbit, and will destroy, alter and degrade habitats used by these species. It will inflict massive soil disturbance, loss of microbiotic crusts, and loss of native understory vegetation as well as the targeted woody components. This will result in large-scale weed invasions and decreased resiliency of the land in the face of climate change effects.	emc0006
3.	This area truly does deserve ACEC protection, as there are many competing values, and large-scale harms imminent - as with the massive denuding of the land with treatments or the plethora of existing roads in the Travel Plan, plus potential mining and other disturbance. This all poses a great threat to wildlife habitat values of the public lands. BLM must consider the Pygmy Forest ACEC proposal that WWVP has provided it with. We request that BLM work with us on this proposal. BLM cast it aside with its destructive Spruce project.	emc0006
4.	4. CWR supports the concept proposed by BLM and the proponent, but wishes to ensure multiple-use concepts are adhered to during the development.	emc0033
5.	In truth, after documenting many of the HMAs where the wild horses and burros used to run freely, before the roundups, these areas could easily be occupied by all of the roughly 50,000 wild horses and burros in holding facilities, without having a negative impact on the land. Contrary to the belief of the BLM, the wild horses and burros out there, in the numbers that used to be, would help bring balance back to those areas again.	emc0038
6.	It is my heart felt wish that you would seriously weigh out your decision, not just concerning this concept that the BLM has for an eco-sanctuary, but to consider the end of further roundups, and for the possibility of restoring back into the original areas from which they were taken, those wild horses and burros in holding facilities.	emc0038

Table C-1
General Comments Outside the Scope of the RMP Amendment/EIS

Comment No.	Comment	Cmt Ltr Code
7.	In truth, after documenting many of the HMAs where the wild horses and burros used to run freely, before the roundups, these areas could easily be occupied by all of the roughly 50,000 wild horses and burros in holding facilities, without having a negative impact on the land. Contrary to the belief of the BLM, the wild horses and burros out there, in the numbers that used to be, would help bring balance back to those areas again. It is my heart felt wish that you would seriously weigh out your decision, not just concerning this concept that the BLM has for an eco-sanctuary, but to consider the end of further roundups, and for the possibility of restoring back into the original areas from which they were taken, those wild horses and burros in holding facilities.	fxc0002
8.	In truth, after documenting many of the HMAs where the wild horses and burros used to run freely, before the roundups, these areas could easily be occupied by all of the roughly 50,000 wild horses and burros in holding facilities, without having a negative impact on the land. Contrary to the belief of the BLM, the wild horses and burros out there, in the numbers that used to be, would help bring balance back to those areas again. It is my heart felt wish that you would seriously weigh out your decision, not just concerning this concept that the BLM has for an eco-sanctuary, but to consider the end of further roundups, and for the possibility of restoring back into the original areas from which they were taken, those wild horses and burros in holding facilities.	fxc0005
9.	NO MORE UNNECESSARY ROUND UPS PAID FOR BY ME, THE TAXPAYER!!	fla0003
10.	I strongly encourage the BLM to cease further roundups and re-open lands on which wild horses and burros should always have been preserved per the Wild Free-Roaming Horses and Burros Act of 1971. A re-examination of current management practices to support natural predation as the primary means of population control is needed. This will require stronger protections for apex predators. I believe this is the best method of supporting a healthy and balanced ecosystem and should be the goal of any successful management program.	fla0069
11.	Why isn't there a plan for ecosystems? Why isn't there an Energy Policy? Why isn't there an Environment Policy? You cannot come to a fair and decent decision without scientific, independent, policies. Enter the 21C!	fla0091
12.	Let us reduce the number of cattle ranging on our public lands; retiring leases would be a nice start.	fla0094
13.	I am not in favor of taxpayer funds being used to finance a private enterprise for some of the world's wealthiest people.	emc0080
14.	The wild horse population is out of control, and without implementing solutions to reduce the reproduction rate, increase adoption or otherwise reduce the number of excess horses, the program will continue to be a burden on the BLM, taxpayers, ranchers, and natural resources on our federal lands. Overpopulation of horse and burro herds is continuing to cause serious problems, including overgrazing, environmental damage, and even starvation and dehydration of the horses and burros themselves. According to BLM figures, the appropriate management level (AML) of horses and burros on the range is about 28,000.	emc0084

**Table C-1
General Comments Outside the Scope of the RMP Amendment/EIS**

Comment No.	Comment	Cmt Ltr Code
	<p>Currently there are over 38,000 on the range and over 40,000 in holding facilities. Since enactment of the Free-Roaming Wild Horse and Burro Act of 1971 (H& B Act), livestock grazing on federal lands has been reduced by as much as 50%, while the horse population has been on the rise. According to BLM, the current population is already 25% above sustainable levels, and, if left unchecked, is projected to double in size in just four years.</p> <p>For these reasons, we fully support and encourage the BLM to act within the parameters of the 1971 Act passed by Congress, which requires the agency to gather and remove all excess wild horses from the range and manage wild horses and burros only in those areas they were found in 1971.</p>	
15.	<p>In closing, I am also taking this opportunity to protest the excessively low and non-viable AMLs that have been decided for all three of the HMAs affected by the ecosanctuary. These are token numbers and do not accord with the true and core intent of the WFHBA. Livestock AUMs should be reduced in these areas and the wild horses given the principal allocation of forage, meaning over 50%.</p>	emc0085
16.	<p>2)Often times the public complains the government only acknowledges those comments that fit in with what it wants to do. To avoid that allegation the names of all individuals, agencies, and organizations as well as their complete comments should be made available to the public possibly at a site specific place.</p>	emc0089
17.	<p>Finally, what set of circumstances allowed Ms. Pickens and SAM to get this action thru the Bureau with such ease and immediacy? It seems that ranchers wanting to make changes to their allotment or have any action taken are years awaiting the decision. Conversely, Ms Pickens' proposal has fast tracked the process and has bypassed many applications still in process.</p>	emc0090

Table C-2
Comments Related to Issues to Be Solved by National Policy

Comment No.	Comment	Cmt Ltr Code
1.	You need to stop all roundups NOW you have done enough damage to them already. You have so many in pens that the tax payer has to pay for where if they are left alone in the wild they can take care of them self. Has they have for hundreds of year. Stop these roundups now!	emc0075
2.	In many areas, the mismanagement of wild horses is creating a situation of single-use, rather than multiple-use, management. Given the animals' impact on soils, forage, riparian areas and water sources; the year-round nature of their existence on the range; and the lack of natural predators of this non-native species, deliberate population control is necessary to maintain a healthy range and multiple uses thereon.	emc0084
3.	Mrs. Pickens and SAM have compared their plan to acquire access to federal land to the process by which cattlemen acquired their grazing permits. She claims, "[The cattlemen] got the BLM land attached to their ranches with sweetheart deals . . ." This statement can only be made in ignorance of the history of and statutory authority for grazing preference rights on public lands. Congress granted our members' preference rights through the TGA under the prior appropriations doctrine. In so doing, Congress established clear stipulations, including that ranchers be in the livestock business and that they prove ownership or control of private base property and water rights. Preference to the forage was granted to the local livestock owners because of their preexisting beneficial use of the forage (which had the added benefit of supporting surrounding local communities). As codified in the Federal Lands Policy and Management Act, owners of the grazing "preference" are issued a 10-year grazing permit--the permit serving as the regulatory mechanism implementing their right to the forage. These preference rights and permits remain tied to the base property so that, as the private property is passed down through the generations, so are the preference rights. Preference rights and permits are taxed and can serve as collateral for loans--in other words, are longstanding possessions of real value and property to our members. In the face of constant threats, from the rise of unnecessary regulation to environmental litigation, our members rely for the protection of their grazing rights on federal statute such as the TGA and the Administrative Procedure Act. Case law, such as the Supreme Court decision in PLC v. Babbitt 2000, reinforces their rights.	emc0084
4.	While we agree with SAM's plan to maintain non-reproducing herds, we contend that as long as reproduction occurs unchecked in herds outside the sanctuary, horse starvation and decimation of our public rangelands will continue. Eco-sanctuaries such as the one in question here will be of no consequence to the greater goal of proper horse and range management. Science and research are needed to find new, effective ways of decreasing the reproduction rate of the entire herd--an idea that has traction in Congress. Once the reproduction rate equals the adoption/sale rate, the need for private pasturing for wild horses will, over time, become unnecessary.	emc0084

Table C-2
Comments Related to Issues to Be Solved by National Policy

Comment No.	Comment	Cmt Ltr Code
5.	The BLM WHB Program has X amount of money allocated it by Congress yearly. The Project Lead, the government employees involved in the creation of the EIS, and Amy Leuders, Nevada's State BLM Director, need to do a cost analysis of this proposal for the public and to weigh these off the range costs against the on the range costs. As it stands now the BLM is asking for \$77 M for Fiscal 2013. Of that \$77 M, less than \$250,000 is used for management on the range. The Law of 1971 says the horses and burros are to be managed "where found," meaning on the range. How much more broke does the BLM want to make this program?	emc0089

**Table C-3
General Comments Related to the RMP Amendment/EIS**

Comment No.	Comment	Cmt Ltr Code
1.	I do not want to see the sanctuary go forward unless it is on private land and the wild horses get to remain free on their HMAs. Madeline Picken's Sanctuary should never effect the wild horses on their HMAs.	emc0002
2.	Simply stated ...private property owners located in wild horse herd areas can partnership with Agencies for the purposes stated in preservation laws for maintenance and continuity of genetically viable wild free roaming horse and burro herds. Partnerships may not deviate from any law designed for their protection, survival and maintenance. Partnerships may not deviate from those mandates that protect the public historic cultural interest and their habitats. Partnerships may not convert the forgoing described assets to another use.	emc0003
3.	This Resource Management plan is fatally flawed and must be amended to comply with a myriad of law, including but not limited to the National Historic Preservation Law Sec 106, ESA for special status species, NEPA, and the FRWHBA. Any state SHPO that fails to comply with NHPA may be subject to loss of federal funding for their historic preservation programs.	emc0003
4.	If anything "Eco sanctuaries" should serve the purpose for re uniting, re establishing and repatriation, to the extent possible, the geographically unique genetic herds that were removed from original herd areas. The agency created the evolutionary interruption equivalent only to the extinction of the condors even as Congress was ensuring our western heritage. BLM was and is required (again, by operation law) to inventory and maintain herd inventories on original herd areas. Those herd areas cannot be converted to any other use. Nothing less can make the pubic whole. It is the remedy in law and there is no other. I believe that BLM and Madeliene Pickens can accomplish this, and it would be supported on the basis of law and public opinion....even over objections of competing interests. There are a multitude of preservation and wild life grants available to achieve this goal without impacting the taxpayer, even as the taxpayer continues to subsidize livestock occupation of the public domain.	emc0003
5.	Please people, I beg of you to leave the wild horses where they are. Also leave the stallions as they are.	emc0005
6.	BLM must consider alternatives that significantly reduce livestock numbers in lands where there is talk of removing wild horses. The full Footprint of livestock in competing with wildlife and horses for food, water and space must be assessed. What has been the livestock actual use by pasture and by allotment for the past 20 years for all affected lands? Please provide all monitoring data as well, and the locations of this data.	emc0006
7.	We incorporate by reference all of our comments, protests and Appeals for the Spruce "Restoration" Project, as well as the ACEC proposal that we have repeatedly submitted to BLM for the Spruce landscape.	emc0006

**Table C-3
General Comments Related to the RMP Amendment/EIS**

Comment No.	Comment	Cmt Ltr Code
8.	There is not necessary detailed information that has yet been provided to the public to enable full understanding of the Ecosanctuary proposal and its effects on this landscape. We are concerned that the horses will be managed like domestic livestock - and not as wild horses. Full upfront disclosure of all existing and foreseeable water sites, projects, internal fences, etc. and their impacts must be provided. This is necessary for baseline ecological understanding --- of the Ecosanctuary.	emc0006
9.	Why isn't BLM considering continuing the wild horse herd here - without the impediment of livestock grazing?	emc0006
10.	BLM must provide thorough and complete baseline information the current conditions of the lands and waters across Spruce. That has never been done. This also shows how BLM is driving blind with its Veg Restoration/Destruction Project. BLM must prepare an integrated EIS to take a hard look at, and balance, all the competing uses here.	emc0006
11.	I am very concerned, and angry, that the greater portions of the forage in the affected HMAs of Goshute, Dolly Varden and Antelope will be given to livestock. This is, as you are very well aware in direct contradiction to the Wild Free-Roaming Horses and Burros Act of 1971 which plainly states that the resources of the herd areas or territories where they were found in 1971 should be "devoted principally" to the wild horses or burros. This is not happening as the BLM well knows.	emc0007
12.	It is my opinion that by placing these horses in fenced areas, and moving them from pasture to pasture as cattle and sheep are managed is only going to encourage the BLM to remove even more mustangs from the wild.	emc0007
13.	I also question whether or not it is even legal for Ms. Pickens to use public lands and not her own private lands as all other holding facilities are required to do.	emc0007
14.	It is my fervent hope that Ms. Pickens and the BLM will adopt a strategy to include both private and publically leased lands that would promote naturally self-sustaining herds that are reproducing, which is paramount in preserving the wild mustangs, which is what well over 80% of American taxpayers want	emc0007
15.	7) Secretary Salazar seems to be overreaching his authority and in violation of the Wild Free Roaming Horses & Burros Act of 1971, which states "Nothing in this Act shall be construed to authorize the Secretary to relocate wild free roaming horses or burros to areas of public lands where they do not presently exist."	emc0011
16.	9) This eco-sanctuary plan is vague and leaves out many important details. More details should have been provided for the scoping process, and I'm formally requesting a 2nd scoping process public comment period after more details are provided, and before an EIS or EA is prepared.	emc0011
17.	The wild horse sanctuary would be something positive for the American Mustang, there has to be a better way to control the wild horse population than what is in place now. I understand the conflict with wildlife that it could cause, but no more	emc0013

**Table C-3
General Comments Related to the RMP Amendment/EIS**

Comment No.	Comment	Cmt Ltr Code
	than what cattle cause that are allowed to graze on the same type of grazing allotments that the horses will be on.	
18.	As a citizen, I must object to this eco-sanctuary idea.	emc0014
19.	Please, please do NOT allow this to happen! I, and most of the American public want our wild horses free on their legally dedicated ranges. We do not want stallions gelded and fenced in on Ms Pickens' property so she can rake in our taxes to pay for her resort! Please, I beg you to stop everything, including round-ups, until a better plan is in place, a plan that we American taxpayers agree with! P.s. It sounds like R. T. Fitch may have such a plan. If you truly care about our wild horses, and what the American public wants, please contact him at info@forceofthehorse.com or 1-800-974-FOTH.	emc0015
20.	Who reaps the benefits? Pickens? BLM? Certainly not the horses!	emc0016
21.	How about this instead: if Ms Pickens is so altruistic, let her pay for the roundup of 500 stallions, geld them and then turn them loose on their own land; not some preserve. It solves the overcrowding that seems to be bothering the BLM	emc0016
22.	I completely oppose any plan that will reduce or zero out the number of wild horses in the Antelope, Goshute, or Spruce Pequop HMAs	emc0023
23.	This should not be a model for future "eco-sanctuaries" across the west that will remove viable wild horse herds and replace them with sterile, non-reproducing herds. Please work to establish this eco-sanctuary on private land or on public lands that do not have wild horse HMAs	emc0023
24.	I am writing to voice my strong condemnation and utter disbelief that the Bureau of Land Management (BLM) is scheming to take advantage of the creation plans of Madeleine Pickens and Saving America's Mustangs (SAM) for a wild horse "ecosanctuary" in Nevada to further their eradication plans for this federally protected heritage species by agreeing to this endeavor in exchange for the opportunity to zero out three Herd Management Areas (HMAs) -- Spruce Pequop, Goshute and Antelope Valley -- that are adjacent to the location of the proposed "sanctuary".	emc0020
25.	I must say, I am a bit confused. I thought Mrs. Pickens bought and now owns the land set aside for the sanctuary and that any wild horses she obtains would be under her jurisdiction. Now I hear these animals would be under Federal "ownership". Why is the BLM retaining "ownership" of these wild horses? As in adoption, does not the person acquiring the horses become the new "owner"? This mustang sanctuary was to be her enterprise -- why must the government impose conditions or, for that matter, be involved at all? Is Ms. Pickens to be a pawn of the BLM? And why is the public not allowed to scrutinize the salient details of her proposal until the deal is done between her and the government? So much for TRANSPARENCY. The American taxpayers, including myself, who have a stake in the public lands managed by the BLM, have every right to	emc0020

**Table C-3
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Comment No.	Comment	Cmt Ltr Code
	know the specifics of this proposal while there is still time to comment on any aspects of this deal that would negatively impact the welfare of not only the animals rescued from the holding facilities but the wild horses who still roam freely in the surrounding HMAs considering that, according to the Scoping Brief, the proposed "ecosanctuary" would have a significant -- and as of yet undefined -- impact on the three surrounding HMAs.	
26.	Ecotourism revolving around non-reproducing mustangs has a life expectancy of 10-15 years based on the average life span of wild horses. What happens then? Will BLM continue to replenish the "ecosanctuary" by conducting yet more roundups and removals of federally protected wild equines from their lawfully designated range? If Congress chooses to withhold financial support for the agency's maintenance of wild horses/ burros removed from our public lands, what's next? Will another infamous memo containing threats of slaughtering the "excess" wild horses in holding begin circulating?	emc0020
27.	I would support the creation of Mrs. Pickens' "ecosanctuary" in which captive wild horses kept in holding facilities would have a chance to roam and live freely but not at the expense of wild free-roaming horses whom the BLM seek to compromise and endanger in exchange for SAM's proposal to be accepted. This indecent proposal is unacceptable. If Mrs. Pickens "ecosanctuary" proposal to rescue already captured wild horses languishing in holding pens is to be fully realized, it must be done without harming wild free-roaming equines in any way -- whether by capture and removal, replacement of intact animals with sterilized herds, reducing AMLs and ultimately zeroing out federally designated HMAs or fencing and blocking off life-saving forage and water resources for wild herds. All of these highly detrimental options that would most definitely negatively impact our wild equines should be off the table in order for the "ecosanctuary" proposal to proceed. There is no justification for our wild herds to be affected in any way by Mrs. Pickens plan and the BLM must not abuse its authority by attempting to exploit this humanitarian gesture to feed its wild horse harvesting machine.	emc0020
28.	I vehemently OPPOSE any and all attempts by the BLM to dictate dangerous conditions on the proposed "ecosanctuary" that would inflict great harm and yield catastrophic results for the wild horses living free in the federally designated Spruce Pequop, Goshute and Antelope Valley HMAs. There MUST be a preferred alternative in the Environmental Impact Statement (EIS) that stipulates that all the wild horses living free in the Antelope Complex will be left completely intact and viable (NOT CASTRATED/STERILIZED), that does not insist on the Spruce allotment being fenced off so wild horses cannot gain access to forage and water for their survival, and that permits Mrs. Pickens to replace destructive cattle with ALREADY gelded wild horses imprisoned in BLM holding facilities on the public lands portion of the land she purchased for her "ecosanctuary".	emc0020
29.	Unfortunately, BLM is failing miserably in their mandate to uphold the intent of the historic legislation to preserve our national heritage. If the BLM is to break the economically unsustainable cycle of roundup, removal and warehousing of our wild equines the agency must proactively change the misguided direction of its pathetically broken Wild Horse and Burro	emc0020

**Table C-3
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Comment No.	Comment	Cmt Ltr Code
	Program. The current population of our captive mustangs stockpiled in government holding facilities now hovers around 50,000 while we are lucky if 16,000 remain in the wild! This cannot continue! To this end, BLM must stop pandering to special interests and begin seriously protecting America's wild equines and THEIR rightful range on OUR public lands. With holding pens virtually bursting at the seams with once free-roaming mustangs, it is imperative that BLM develop a plan to HUMANELY manage our wild herds ON THE RANGE where they belong and in the most minimally intrusive way thereby negating the "need" for unnecessary, cruel and costly taxpayer-funded helicopter stampedes, roundups and permanent removals.	
30.	BLM must implement a sustainable plan to preserve OUR wild herds on OUR Western public lands and restore their protections set forth in the 1971 Wild Free-Roaming Horse and Burro Act allowing these magnificent animals to live in peace on THEIR rightful ranges. This is the "new direction" that needs to be taken to save our national heritage for future generations.	emc0020
31.	I, along with the majority of the American public, fully expect BLM to seriously consider and accept all comments from wild equine experts, range experts and that of the public whose opinion matters greatly on this issue of OUR wild horses and burros on OUR public lands. I would also expect the BLM to accurately and truthfully reveal the actual figures on the members of the public who submitted comments on the Scoping Project Brief for the Northeast Nevada Wild Horse Ecosanctuary, proposed by Mrs. Pickens and SAM, and their positions on this extremely important issue, as your agency is legally required to do so under the National Environmental Policy Act (NEPA). BLM cannot continually ignore the will of the American people on the protection of our rapidly vanishing wild herds by persisting in claiming that no one cares about the plight of these national treasures when legions of concerned citizens are calling for the preservation of our wild herds only to have our protests fall on deaf ears. This cannot and must not continue. The agency must acknowledge that the will of the majority of Americans should outweigh that of a small minority of special interests with personal agendas that do not include the existence of wild horses and burros in the American West. BLM must fulfill its mandate to protect America's wild equines instead of constantly attempting to find new ways to manage them into extinction to appease the few who care nothing about the preservation of this national heritage species.	emc0020
32.	Please STOP your plans for the Mustang Tombstone Eco-Resort! It's based on a complete farce that setting up this "petting zoo" of so-called WILD mustangs - complete with gelded stallions is a SHAM. Please consider leaving the wild mustangs who roam on the land alone - this is what the PEOPLE expect to see - not a staged mockery of reality.	emc0024
33.	2. Direct Taxpayer Support Why could this scheme not be done exclusively by the BLM? Because the taxpayer immediately would see it as the budget vortex it is, sucking funds into unfathomable reaches. Dressing it up as a public-private partnership obscures the reality that the taxpayer will fund everything. As direct payment for managing feral horses, Saving America's Mustangs (SAM) will	emc0030

**Table C-3
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Comment No.	Comment	Cmt Ltr Code
	receive up to \$253,000 from taxpayers	
34.	Indirect Taxpayer Support The indirect payments may dwarf those receipts. There are unstated indirect costs in that as a 501(c)(3), virtually all of SAM's operation will be subsidized by the taxpayer. They will erect forty new miles of fence and then maintain a total of approximately 160 miles. Yes, they will fence in the wild horses. They will erect facilities for eco-tourism, including classrooms, overnight accommodations, food services, water, sewer, power, and parking lots. The total of these easily may exceed six figures of capital and six figures of operating expenses. Millions in taxpayer payments for SAM efforts may be involved, since SAM is a registered charitable and educational non-profit enterprise.	emc0030
35.	Agency Growth The declared proposal requires intensive monitoring and participation by agency personnel. As a rule, ranchers do not need bureaucrats in their operations. But SAM asks for bureau monitoring of the herd, as well as bureau participation in the education of eco-tourists. The same agency which will approve or disapprove the SAM partnership will receive substantial material benefit by approving the conversion from ranching to what will become essentially the care and feeding of bureaucrats.	emc0030
36.	NO!	emc0036
37.	Duplicate of emc0036	emc0037
38.	This BLM-crafted proposal is totally egregious and ripe for litigation.	emc0021
39.	Absolutely no HMAs can house nonreproducing herds. That is completely counter to the original intent of the 1971 Act and 43 Code of Federal Regulations, §4700.0-6(a), which states in part, that wild horses and burros "shall be managed as selfsustaining populations of healthy animals in balance with other uses . . ." This is yet another ploy to zero out existing HMAs, which is also not supported by the 1971 Act.	emc0021
40.	With all of the above in mind, it's actually ridiculous to be having eco-sanctuary proposals on the table at all. First, the public lands were meant to be sanctuaries for America's supposedly "wild and free-roaming" naturally-reproducing WH&B and second, the horses in holding should never have been taken off the range in the first place, as their numbers were obviously not "excess" as compared to the livestock and other wildlife numbers on the range.	emc0021
41.	But, since this eco-sanctuary debate has come to the table, below and attached is "Wild Horse Sanctuaries in the West, Workable Options to Get STH Horses into LTH Pastures" for your serious consideration.	emc0021
42.	(The follow attachment is included in InfoRcvdDuring_Scoping folder) WILD HORSE SANCTUARIES IN THE WEST	emc0021

**Table C-3
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Comment No.	Comment	Cmt Ltr Code
	<p>THREE WORKABLE OPTIONS TO GET STH HORSES INTO LTH PASTURES</p> <p>1) Interested party:</p> <ul style="list-style-type: none"> - buys a private ranch, no public lands attached - develops fencing/water, if necessary, at own expense - creates several large long-term holding pastures - takes as many BLM geldings/mares 50/50 from short-term holding as the land can support - horses remain the property of the BLM & are protected from the slaughter pipeline - gets paid the \$475-500/year/horse just like the LTH facilities get in the Midwest - supplement feed would be the responsibility of private ranch owner <p>The advantage of this option is that the horses don't have to be transported across the country at huge taxpayer expense, they incur less injury and stress and can stay closer to their Western homelands where they have adapted for centuries. This is NOT an eco-sanctuary setup as the horses are non-reproducing and do not have the tourist draw for education or viewing natural wild horse behavior in their fascinating social family matrixes.</p> <p>2) Interested party:</p> <ul style="list-style-type: none"> - buys a private property base ranch that has BLM public land allotment(s) attached that DO(ES) NOT overlap existing reproducing wild herd HMAs and is far removed from them - develops fencing/water, if necessary, as a shared expense with BLM - livestock AUMs are transferred to wild horse AUMs at a 1:1 ratio as has been done since the Taylor Grazing Act was passed for cattle and domestic horses - takes as many BLM geldings/mares 50/50 from short-term holding as the land can support - horses remain the property of the BLM & are protected from the slaughter pipeline - gets paid a reduced fee/year/horse, i.e., \$200/year/horse, or somesuch, because the public lands are being used for the horses' maintenance, not private lands - supplement feed would be the responsibility of base ranch owner <p>The advantage of this option is that the horses don't have to be transported across the country at huge taxpayer expense, they incur less injury and stress and can stay closer to their Western homelands where they have adapted for centuries. This is NOT an eco-sanctuary setup as the horses are non-reproducing and do not have the tourist draw for education or viewing natural wild horse behavior in their fascinating social family matrixes.</p>	

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Comment No.	Comment	Cmt Ltr Code
	<p>This option does seem foolish, however, when many of the non-reproducing horses in holding could be returned to the over 20 million acres of original Herd Areas that were designated for them legally back in 1971, but were taken away from their use. This would be free to the taxpayer.</p> <p>3) Interested party (should be Pickens' Proposal):</p> <ul style="list-style-type: none"> - buys a private property base ranch that has BLM public land allotment attached that DOES overlap existing reproducing wild herd HMAs - develops water, if necessary, as a shared expense with BLM - livestock AUMs are transferred to wild horse AUMs at a 1:1 ratio as has been done since the Taylor Grazing Act was passed for cattle and domestic horses - because of the increased AUMs now available to wild horses, the AMLs of the overlapping HMAs within the modified allotment are increased - the modified allotment is to support exclusively reproducing wild herds - no fencing or non-reproducing herds are to interfere with or be adjacent to the existing HMAs or wild horses within the modified allotment - Section 1334 of the 1971 Act supports this option: "Nothing in this section shall be construed to prohibit a private landowner from maintaining wild free-roaming horses or burros on his private lands, or lands leased from the Government, if he does so in a manner that protects them from harassment, and if the animals were not willfully removed or enticed from the public lands. Any individuals who maintain such wild free-roaming horses or burros on their private lands or lands leased from the Government shall notify the appropriate agent of the Secretary and supply him with a reasonable approximation of the number of animals so maintained." - no monies are received from the BLM for the maintenance of these wild herds as they are on their legal HMA homelands and the modified allotment and are thus protected - a non-profit entity is formed to receive donations like any other independent sanctuary to create accommodations, educational programs and tours of the natural reproducing herds that are on their legal HMAs and the modified allotment allocated to them - a model management program is designed to utilize dartable PZP, humane natural horsemanship techniques and water/bait trapping to manage the herds' population, in cooperation with the BLM and at BLM's expense <p>This is a true eco-sanctuary setup as the horses are reproducing which provides a definite tourist draw for historical/cultural/model management education and viewing natural wild horse behavior in their fascinating social family matrixes. If interested party wants to save non-reproducing, short-term holding horses, see Items 1) and 2) above, or locate them only on private base ranch property that is NOT adjacent to the existing HMAs/modified allotment where</p>	

**Table C-3
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Comment No.	Comment	Cmt Ltr Code
	the reproducing herds roam, as described in 3) above.	
43.	They need a HOME not trying to come into our yards and streets and dodge bullets, Their fate is in your hands- we need this Sanctuary NOW!	cfc0001
44.	My comment is this: LEAVE THE WILD HORSES ALONE! They are federally protected by an Act of Congress, ergo when you break the law regarding their protected status, you are a criminal	emc0022
45.	the Mustang Tombstone Eco-Resort is a no go in the eyes of the American public and we citizens respectfully ask Mrs. Pickens to go back to the drawing board and come up with a plan that STOPS the BLM from unnecessarily removing wild horses from their rightful land versus warehousing the victims of the atrocities and enabling the BLM to continue their destruction of our national icons, the wild horses and burros of the west. Say NO to the Mustang Tombstone	emc0026
46.	I am appalled to hear of this horrible plan. Mustangs are very important to us. Please stop the removal and slaughter of these wonderful animals. The BLM must quit eradicating the herds. They must be protected. They do not need management either. They have looked after themselves and kept healthy for hundreds of years with out OUR help. Let them be.	emc0027
47.	I am writing to oppose the Mustang sanctuary plan proposed by Madeline Pickens, which involves fencing part of three HMA's in Nevada. This is a poorly conceived plan, which is bad for the horses, bad for the range and bad for the American public. There are other, better plans that would take horses out of holding and let them live out their lives in a sanctuary setting. Rather than protect the horses, the Pickens plan will rid our western public lands of the wild horses and burros that they are tasked to protect. Please continue to investigate other ways in which to safeguard and protect these horses and burros.	emc0029
48.	Using BLM data, the allotment will sustain 909 cattle, and perhaps no more than 505 horses. Some ranchers maintain it cannot sustain that many horses. Using these numbers, with a \$1,000 value for cattle requiring three years to raise to market, the annual economic value produced on the allotment is \$303,000. From this the rancher pays the agency nearly \$15,000 per year in grazing fees. Additionally, sales taxes approaching \$21,000 are paid to the state and county.	emc0030
49.	Though time has not allowed rigorous comparison and analysis, these numbers may be substantiated by the extensive work done for and by Elko County in 'The Impact of Federal Land Policies on the Economy of Elko County, Nevada,' (Leaming, 2010). In that analysis, it is brutally apparent that federal bureaucrats wield hundreds of millions of dollars in financial control over the County, let alone the State.	emc0030

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Comment No.	Comment	Cmt Ltr Code
50.	The BLM is not following the Wild Free-Roaming Horses and Burros Act as Amended Like many bureaucracies, the BLM is selectively following the acts to which it is obligated. When it chooses to ignore sections, it does so by omission or commission, as expedient. Perhaps the most significant matter regarding the Spruce Mountain allotment is the refusal to cull the range-wide feral horse herd. By allowing the progressing overpopulation of feral horses, the BLM simply increases its own budgetary and personnel requirements. The penalty to the agency is simply the need to budget more SUVs with light racks and employ more biologists with digital recorders. Fiscal and scientific controls are not a concern for the bureau-scientific complex, whether it be alternative energy or feral horses.	emc0030
51.	The legal requirement to cull overpopulation (PL 92-195 as amended, Sec. 3b. 2. (c)) is systematically ignored by the agency. The wildlife result is that feral horses are subject to starvation, weakness, illness and disease due to overgrazed range and deteriorated springs, among other effects of overpopulation. The agency views the result as positive in that additional animals require additional financial and personnel resources for program administration.	emc0030
52.	On balance, this selective adherence to the Act has exacerbated poor conditions of both the range and the feral animals. The proposed public-private partnerships to establish eco-sanctuaries essentially do nothing more than perpetuate and increase the size of both the feral horse and personnel herds at taxpayer's significant expense. The range conditions will not improve; the conditions of the feral animals will not improve. Rancher's and other taxpayer's conditions will not improve. Apparently, the conditions of agency employees and their partner contractors will improve substantially.	emc0030
53.	<p>Conclusion</p> <p>Fundamentally, cattle raising is economically productive and vibrant. The proposed fencing in and sterilizing of feral horses will render them sorrowfully listless. The proposal requires productive citizens to forfeit a portion of or their entire livelihood in order allow SAM to concentrate and sterilize the feral horses, thereby committing a heinous atrocity all in the name of SAM's misdirected eco-tistical guilt. The BLM will support this annual negative economic impact because the agency sees a virtual transfer of additional funds to their control. In reality, the eco-sanctuary proposal is societal loss of food production with the end result of sterile, captive formerly feral show-horses. As an absolute minimum, SAM must pay the annual \$556,000 to \$1,800,000 to Elko County and the ranchers who have been and will continue to be harmed by SAM's taking of that amount of economic productivity.</p>	emc0030
54.	This is the complete antithesis of Madeleine's original plan, which was to take horses currently in long and short term holding and give them a natural habitat in which to live out their lives. Instead, we now have the BLM proposing to round up even more wild horses with the express purpose of destroying their herds, tearing apart the natural and existing family bands, gelding the stallions and separating them out so they and they only can then become an "exhibit" of "wild horses" in what would then be Madeleine's zoo???? A herd of gelding is NOT a wild horse herd!	emc0035

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Comment No.	Comment	Cmt Ltr Code
55.	This is sheer and utter nonsense and as an American taxpayer I am insulted and disgusted that you think you can spend my money in such wanton and depraved ways— and I'm sure I only know less than the half of it.	emc0035
56.	You are destroying OUR property—it is not yours—it belongs to us all and you are arrogantly ignoring the public's wishes for THEIR land and THEIR horses—again, they are NOT YOURS/the BLM's!	emc0035
57.	Craig Downer has a very detailed proposal that makes more sense than anything the BLM has ever come up with—why don't you pay attention to it?	emc0035
58.	In case I haven't been clear, I am 100% AGAINST THIS SO-CALLED "ECO-SANCTUARY" PROPOSAL in its current form.	emc0035
59.	I am writing about the proposed Eco Sanctuary. The whole idea of removing mares, gelding studs & allowing them to remain in an area that would be fenced off is not going to solve any current issues being faced & it will slowly remove the wild horse completely	emc0043
60.	The wild horses have been in their protected areas for centuries & to interrupt their natural habitat & habits will not only destroy the habitat, it goes against the original laws protecting wild horses against what this woman is proposing to do.	emc0043
61.	The roundups each year, this proposed Eco sanctuary & private cattle grazing on public lands needs to be stopped. The lands in which wild horses own belong to THEM, not to cattle ranchers, not to the public, but to THEM. I propose, no fences, no eco sanctuary, no more round -ups, no more gelding of studs & ranchers get your cattle back on your own land.	emc0043
62.	Thank you SO much for finally putting together a proposal for M. Pickens horse sanctuary. It is cost effective/environmentally effective and the money the recreation will bring to that area is well worth considering. And the potential to keep Mustang herds together and maintained is astronomical. It's a win-win for everyone. The BLM will have less to contend with, taxpayers will save millions, the land and living things on it will all be better off and money coming in anywhere is a good thing. There will be opposition, I'm sure. If all could work together, I know there is a solution for that area and the ecosanctuary is the best option.	emc0051
63.	The issue you do not have on the Federal Register List is; How do you justify a private individual using Federal Land to run Federal Livestock on and being paid to do it with Federal Dollars. The answer is, you don't.	emc0053
64.	I support Saving America's Mustangs' (SAM's) goals for the creation of a wild horse "eco sanctuary" in northeastern Nevada. These goals include: returning horses currently held in BLM short-term holding facilities to a natural habitat environment; utilizing the public lands in the Spruce grazing allotment for the benefit of horses; and creating an eco-sanctuary that highlights the importance of wild horses to American history and culture.	fla0000 baseltr1

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Comment No.	Comment	Cmt Ltr Code
65.	I strongly believe that these goals CAN AND MUST BE accomplished without negatively impacting the wild horse herds living in the three Herd Management Areas (HMAs) that comprise the Antelope Complex and will be affected by the proposal.	fla0000 baseltr1
66.	Since 1971, wild horses have been zeroed out from 111 herd areas representing over 20 million acres; this represents nearly half of the habitat originally designated for wild horses and burros under the Wild Free-Roaming Horses and Burros Act. In 70% of the remaining herd management areas, BLM's population targets are set at levels that will not ensure genetic viability. Given these numbers, any proposals for ecosanctuaries or holding facilities that result in a net loss to existing populations explicitly undermine the goals of wild horse preservation and the Wild Free Roaming Horses and Burros Act.	fla0000 baseltr1
67.	Further, please include a preferred alternative in the Environmental Impact Statement (EIS) that will leave all wild horses in the Antelope Complex intact by not requiring the total fencing off of the Spruce allotment and allowing Saving America's Mustangs to replace cattle with gelded horses from BLM holding facilities on the public lands portion of the sanctuary.	fla0000 baseltr1
68.	I support creation of a sanctuary where horses otherwise residing in holding facilities can live and roam. However, I object to any attempt by the BLM to use an "ecosanctuary" as an excuse for reducing the number of wild horses who are protected under federal law and/or the acreage available to them.	fla0000 baseltr1
69.	I urge the BLM to ensure that the ecosanctuary proposed by Saving America's Mustangs (SAM) proceeds without harming the existing wild horse herds in the area. I support SAM's goals for the ecosanctuary, including the return of captured mustangs from BLM feedlots to a natural setting and the use of a public grazing allotment for the benefit of horses instead of to graze cattle. However, I oppose any attempt by the BLM to use the sanctuary as an excuse to reduce or zero out wild horse herds.	fla0000 baseltr2
70.	I strongly believe that Saving America's Mustangs' worthy goals CAN AND MUST BE accomplished without negatively impacting the wild horse herds living in the three HMAs that comprise the Antelope Complex and will be affected by the proposal.	fla0000 baseltr2
71.	Since 1971, wild horses have been zeroed out from 111 herd areas representing over 20 million acres; this represents nearly half of the habitat originally designated for wild horses and burros under the Wild Free-Roaming Horses and Burros Act. In 70% of the remaining herd management areas, BLM's population targets are set at levels that will not ensure genetic viability. Given these numbers, any proposals for ecosanctuaries or holding facilities that result in a net loss to existing populations explicitly undermine the goals of wild horse preservation and the Wild Free Roaming Horses and Burros Act.	fla0000 baseltr2

**Table C-3
General Comments Related to the RMP Amendment/EIS**

Comment No.	Comment	Cmt Ltr Code
72.	Further, please include a preferred alternative in the Environmental Impact Statement (EIS) that will leave all wild horses in the Antelope Complex intact by not requiring the total fencing off of the Spruce allotment and allowing Saving America's Mustangs to replace cattle with gelded horses from BLM holding facilities on the public lands portion of the sanctuary.	fla0000 baseltr2
73.	I support creation of a sanctuary where horses otherwise residing in holding facilities can live and roam. However, I object to any attempt by the BLM to use an "ecosanctuary" as an excuse for reducing the number of wild horses who are protected under federal law and/or the acreage available to them.	fla0000 baseltr2
74.	I urge the BLM to ensure that the ecosanctuary proposed by Saving America's Mustangs (SAM) proceeds without harming the existing wild horse herds in the area. Although I support the goals of the ecosanctuary to return captured mustangs from BLM feedlots to a natural setting and utilize a public grazing allotment for the benefit of horses instead of to graze cattle, I oppose any attempt by the BLM to use the sanctuary as an excuse to reduce or zero out wild horse herds.	fla0000 baseltr3
75.	I strongly believe that Saving America's Mustangs' goals CAN AND MUST BE accomplished without negatively impacting the wild horse herds living in the three HMAs that comprise the Antelope Complex and will be affected by the proposal.	fla0000 baseltr3
76.	Since 1971, wild horses have been zeroed out from 111 herd areas representing over 20 million acres; this represents nearly half of the habitat originally designated for wild horses and burros under the Wild Free-Roaming Horses and Burros Act. In 70% of the remaining herd management areas, BLM's population targets are set at levels that will not ensure genetic viability. Given these numbers, any proposals for ecosanctuaries or holding facilities that result in a net loss to existing populations explicitly undermine the goals of wild horse preservation and the Wild Free Roaming Horses and Burros Act.	fla0000 baseltr3
77.	Further, please include a preferred alternative in the Environmental Impact Statement (EIS) that will leave all wild horses in the Antelope Complex intact by not requiring the total fencing off of the Spruce allotment and allowing Saving America's Mustangs to replace cattle with gelded horses from BLM holding facilities on the public lands portion of the sanctuary.	fla0000 baseltr3
78.	I support creation of a sanctuary where horses otherwise residing in holding facilities can live and roam. However, I object to any attempt by the BLM to use an "ecosanctuary" as an excuse for reducing the number of wild horses who are protected under federal law and/or the acreage available to them.	fla0000 baseltr3
79.	Thank you for providing the opportunity to express my adamant opposition to the proposed Spruce Wild Horse Eco-sanctuary. This proposal is seriously flawed from almost any angle from which it may be viewed. I will list a few concerns and questions that I have regarding the proposal. This is one more step in the wrong direction taking a valuable natural resource out of productive use.	rmc0005

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Comment No.	Comment	Cmt Ltr Code
80.	Organizations such as Saving America's Mustangs ("SAM") provide misinformation that would paint a different picture. The numbers and statistics churned out by SAM are simply inaccurate. Furthermore, SAM supporters have no idea of the practicalities of managing a program on Western ranges. The BLM should proceed with caution before entering into any arrangement with SAM and related organizations.	rmc0005
81.	Question: How can this proposed sanctuary work in harmony with all the other public multiple uses of these federal lands, i.e. hunting, prospecting, camping, hiking, mining, Christmas tree cutting, bird watching, ATV riding, etc., etc.?	rmc0005
82.	do the following: 1. change Ms. Pickens livestock class from cattle or sheep to horses. 2. sell her horses from the BLM pens to fill her permit. 3. charge her the grazing fee, the same as any other livestock owner	emc0053
83.	Finally, to adequately provide input into this EIS NDOW requests cooperating agency status under the National Environmental Policy Act (NEPA). We have expended great efforts and energy to improve wildlife resources on Spruce Mountain and wish to participate in the analysis and evaluation of this new wild horse management concept.	emc0018
84.	It seems to me & many other people that zeroing out THREE HMAs, gelding all the stallions in these HMAs, putting mares & foals in LTH so that there can be a non-reproducing herd there.	emc0031
85.	This has become so ridiculous - lets see, we fence a goodly part of three HMAs - remove those horses - some to LTH - then we take horses from long term holding (geldings of course) & bring them to this so called sanctuary. If it werent so sad for the horses, it would be laughable.	emc0018
86.	6. TWR supports the concept proposed by BLM and the proponent, but wishes to ensure multiple-use concepts are adhered to during the development.	emc0032
87.	7. TWR offers to meet with the BLM and proponent to discuss these concerns and others of mutual interest.	emc0032
88.	6. CWR offers to meet with the BLM and the proponent to discuss these concerns and others of mutual interest.	emc0033
89.	I am intrigued by the possibilities of the feral horse sanctuary concept. This is due to the impossible task faced by the BLM in trying to manage non-indigenous and destructive feral horses and burros on the public lands as dictated by multiple-use laws without degrading healthy and sustaining ecosystems.	emc0034
90.	As stated in the BLM's proposed sanctuary handout, SAM's proposal "would also provide Western history--and wild horse-related education and promote eco-tourism.." Since the sanctuary would be mostly funded by hard working American taxpayer dollars managed by the BLM, any educational materials, lectures, and other feral horse related educational presentations by SAM should be factual, balanced, based on sound science, and especially, truthful. This material should be checked and authenticated by BLM approved multi-disciplined professionals in all the fields of	emc0034

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Comment No.	Comment	Cmt Ltr Code
	education topics to be presented to the general public and visitors to the feral horse sanctuary. Emotional rhetoric, biased perspectives, and untruthful "facts" do no one any good. Especially feral horses, indigenous wildlife, as well as American taxpayers, who ultimately suffer. Truthful presentation will allow American citizens interested in feral horse well-being to make sound decisions to persuade unknowing and ignorant partisan politicians (not meant in a derogatory sense) to work together and compromise to pass appropriate legislation that will benefit not only the feral horse themselves, but their advocates, the BLM in their present near impossible conditions of Congressional legislative mandated missmanagement, and citizens of the United States.	
91.	I am encouraged by the possibilities presented by the feral horse sanctuary concept. That is if it can lead to fewer HMAs in Nevada and more reasonable numbers of feral horses free-roaming and periodically ravaging the fragile Great Basin ecosystems, and bring about rational, sustainable, and reasonable management costs to the American taxpayers.	emc0034
92.	Nevada public lands have carried the brunt of feral horses with over 50% of the now free-roaming one's, not including those now being held in expensive domesticated settings of short-term and long-term feral horse retirement pastures.	emc0034
93.	This is unacceptable, it's merely a long-term holding, non-reproducing, area to put the wild horses. Please reconsider.	emc0042
94.	I have found it has been the continual assertion by the Bureau of Land Management that it is striving to maintain a thriving natural ecological balance in reference to the wild horse and burros and that this is its constant goal in managing them. The BLM maintain that the ranges can only support what it calls an appropriate management level of wild horses in reference to the herd management areas as a whole, and based upon this number, has justified its aggressive roundups to take in what it calls excess wild horses and burros, due to what it terms, overpopulation. The BLM's alternative to the roundups, in this particular area, is an eco-sanctuary made up of a non producing number of wild horses, restricted within a fenced area, and zeroing out the those areas of the HMAs, not contained within these boundaries. I would like to address this alternative point by point, purely from a scientific standpoint.	emc0038
95.	The concept of a thriving natural ecological balance, within any ecosystem, and implied in the very term, "eco-sanctuary" relates to the fact that the system is self sustaining. This means it has the ability to freely reproduce, with no restrictions, other than those instituted by nature itself. Density dependent and inhibition come into play here as other species of animals interact with the wild horses and burros, along with predators and environmental conditions to maintain the appropriate levels of each individual species of animal with in that system.	emc0038
96.	(2) This also implies the free movement of all species in and out of an area. With respect to the wild horses and burros, this means that their migratory routes from winter and summer areas, along with historic water sources are accessible, unrestricted by fencing. To continue, it also implies that the natural predators of the wild horses and burros are not fenced out, as with any eco-sanctuary, or ecosystem, these predators are also an intrinsic aspect of a, "thriving natural	emc0038

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Comment No.	Comment	Cmt Ltr Code
	ecological balance".	
97.	In conclusion, it is clear, based upon the proposals of the BLM for this eco-sanctuary, that it is an excuse to be able to zero out more of the legally designated areas, given to the wild horses and burros, as the principal species within those areas, by the Free Roaming Wild Horse and Burro Act.	emc0038
98.	The BLM has no business taking tax payer dollars and using it in such a fraudulent manner - to only benefit special interests and cronyism at the expense of an American heritage and their right to live on the lands given to them by law...	emc0038
99.	Please don't kill wild horses. Instead, create a sanctuary where horses otherwise residing in holding facilities can live and roam.	emc0044
100.	Also, I object to any attempt by the BLM to use an "ecosanctuary" as an excuse for reducing the number of wild horses who are protected under federal law and/or the acreage available to them.	emc0044
101.	I am writing to express my approval of Madeleine Pickens' horse sanctuary. I think it is wonderful that these horses will have an opportunity to live on a free range verses the corrals. Please do everything you can to expedite the process so these horses can move to their new home as soon as possible.	emc0048
102.	This proposal has morphed into the worse possible scenario for wild horses in the West. It is completely unconscionable that BLM would propose to remove all the horses from the existing 3 HMAs that abutt Madeleine's ranch and then allow her to put only geldings out on her land and on the surrounding public lands.	emc0041
103.	There is NO reasoning that BLM can give to support this action that would ever satisfy me. It is simply totally against the spirit and letter of the 1971 Act to remove MORE designated herd areas from free-roaming wild horses. BLM has already removed millions of acres from these rightfully designated areas for wild horses over the years since 1971. There is simply no justification to do this.	emc0041
104.	Honestly, this looks completely like a retaliatory measure aimed at advocates who support wild horses in the wild in America. I can hardly perceive it any other way - you do not present any compelling foundation for this.	emc0041
105.	It is really a shame that the wonderful opportunity that Ms Pickens has brought to the table has been totally squandered by BLM and instead turned into yet one more excuse to get rid of more wild horses in the wild and to remove more hundreds of thousands of acres from the legally granted wild horse areas as set out by the 1971 Act.	emc0041
106.	This ranch of Madeleine's could have been such a great chance to do something different, to make new approaches to celebrating America's wild horses, to boosting local tourism with a partner who does care about wild horses and who is not just a cattle rancher looking to pad his income with the easy hands-off "work" of long term holding contracts where there is zero accountability and no requirement for public access.	emc0041

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107.	This eco-sanctuary could have been modeled on the Wild Horse Reserve concept that has been put forward by Craig Downer, something that is intended to put the horses into a natural environment that is controlled by natural boundaries and some contraception while allowing them to remain wild and to continue reproducing. With a preserve design integrated into the eco-sanctuary, Americans and world citizens would flock to the area to see wild horse families, learn history, ecology, biology, geography, create art and boost local economies while doing so.	emc0041
108.	You folks at BLM should be very ashamed for what you are doing here. There is nothing beneficial for wild horses, nothing beneficial for future protection and genetic viability of our wild horses, nothing to protect them or to protect their designated lands, nothing to bolster local economies via eco-tourism, nothing to engage Americans and others interested in learning about our wild places and wild animals, nothing but one more assault on America's supposedly protected wild horses.	emc0041
109.	I am very much in favor of mustangs being managed by Madeleine Pickens and Saving America's Mustangs. She has worked diligently to create a place for them to live safely "in the wild" and has nothing but their well being in mind.	emc0057
110.	No wild horses should be in pens. The few thousand left should be "free ranging" as the original protection bill in 1971 stated. None should be warehoused.	emc0060
111.	A few thousand horses aren't too many compared to MILLIONS of cattle, sheep, oil/gas wells and pipelines, mines, houses, developments, etc. all using more resources and are big polluters compared to a few thousand horses.	emc0060
112.	Issue #1: It is improper and possibly illegal to use Federal Land and Federal Livestock in this manner. If you change Ms. Pickens class of livestock to horses, sell her the horses, and charge her the grazing fee then and only then would it be proper.	emc0061
113.	Stallions, Mares, and Foals. They make a mustang herd. I feel SAM has betrayed the mission. I thought there would be a money making guest ranch to let the public watch the herds and trail ride the mustang geldings. In the southeast many groups are training mustangs including young people. The taxpayers don't need something else to pay for.	emc0067
114.	Your evil plan will eliminate all wild horses from 3 HMA's: Spruce Pequop, Goshute, and Antelope Valley. Pickens ecosanctuary would be a good idea for any excess geldings, but an extremely bad plan on the whole.	emc0063
115.	You think taxpayers are plain stupid, that we can't see your plan to start eco-sanctuaries to remove all the wild horses from their lands and make them all non-producing and locked up to be tourist attractions.	emc0063
116.	The new people also need to operate within the boundaries of the 1971 law protecting these animals that are so necessary to a healthy ecosystem.	emc0074
117.	The current BLM MUST be stopped before they take away everything that our history has left in favor of cattle grazing, oil and gas drilling and mining. The government has done this before with the buffalo and wolves and disaster followed.	emc0074

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	We need to stop them before it happens again with the wild horses and burros. They are breaking a federal law and it is quite obvious that the federal government won't step in until they are forced to.	
118.	I am concerned that the SAM sanctuary idea is not well thought through and will do one of two things. Either corrupt the 1971 Wild Horse and Burro Act by changing the basic premise of it by having the HMAs controlled by a outside group or party. OR the program will go under as have so many and the problems will be beyond what the BLM can handle in a reasonable manner.	emc0092
119.	I would not be happy if it turned out that more that what is on the face of the program was surrendered to SAM or Pickens. At the very least control of water, minerals and open use by recreational parties needs to be keep under BLM control.	emc0092
120.	I think that the idea has merit but needs to be tested on a much smaller scale and with only 1 HMA involved and a much smaller area and number of horses.	emc0092
121.	I trust the BLM will do the right thing and not approve this eco-sanctuary as currently planned.	fxc0003
122.	Why would you let Pickens have a sanctuary and pay her when you could zero out the HMA's in question and put just geldings out there at no cost to anyone? It would save all that money to just gather the existing horses and replace with non producing geldings. Hello, save the money.	emc0069
123.	In conclusion, it is clear, based upon the proposals of the BLM for this eco-sanctuary, that it is an excuse to be able to zero out more of the legally designated areas, given to the wild horses and burros, as the principal species within those areas, by the Free Roaming Wild Horse and Burro Act.	fxc0002
124.	I have found it has been the continual assertion by the Bureau of Land Management that it is striving to maintain a thriving natural ecological balance in reference to the wild horse and burros and that this is its constant goal in managing them. The BLM maintain that the ranges can only support what it calls an appropriate management level of wild horses in reference to the herd management areas as a whole, and based upon this number, has justified its aggressive roundups to take in what it calls excess wild horses and burros, due to what it terms, overpopulation. The BLM's alternative to the roundups, in this particular area, is an eco-sanctuary made up of a non producing number of wild horses, restricted within a fenced area, and zeroing out the those areas of the HMAs, not contained within these boundaries. I would like to address this alternative point by point, purely from a scientific standpoint.	fxc0002
125.	In conclusion, it is clear, based upon the proposals of the BLM for this eco-sanctuary, that it is an excuse to be able to zero out more of the legally designated areas, given to the wild horses and burros, as the principal species within those areas, by the Free Roaming Wild Horse and Burro Act.	fxc0005

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126.	I beg you, please leave these National Treasure alone. Let them stay in their natural habitat and run free. Do not fence them in, do not geld the stallions and do not take away their family bands. These beloved horses should be protected and allowed to be free. Their ancestors enabled ours to survive and thrive in our County. Without them the Pioneers of the West (and throughout America) would have perished. It's your duty now to protect them and reward them for their part in making these lands available and habitable for us. Do the right thing, leave them alone to live their lives.	emc0071
127.	<p>I urge the BLM to structure a plan that follows and adheres to the mandates of the Free Roaming Wild Horses and Burros Act, which is the law.</p> <p>While I am fully In support of a plan that removes Captive Wild Horses and Burros from holding facilities/ prisons, and puts them back onto the land where they belong, it is Imperative that we don't harm the remaining Free Roaming WH&B in the process.</p> <p>Saving America's Mustangs is a plan that MUST be in conformance with and follow the mandates and spirit of the Free Roaming Wild Horses and Burros Act.</p>	fxc0004
128.	<p>There Is a workable possibility here and SAM could and should betome a pilot program for an IN THE WILD/RESERVE DESIGN management program.</p> <p>Reserve Design is the process of planning and creating a natural reserve in a way that effectively accomplishes the goal of the reserve.</p> <p>Successful reserves incorporate important ecological ond social factors Into their design. Such factors include the natural range of predators.</p> <p>The Goal that we must always strive to achieve is a TRULY Thriving Ecological Balance ANDself-sustaining, reproducing Wild Herds.</p>	fxc0004
129.	No ecosanctuary should exist. A waste of money, time, and resources.	fxc0006
130.	We appreciate the effort BLM is making by preparing an Environmental Impact Statement (EIS), analyzing in detail the impacts of BLM's version of the Saving America's Mustangs' (SAM) proposed plan. We do not believe that this scoping document reflects the plan that was originally laid out by SAM. We recommend that the Agency analyze the original SAM Eco-Sanctuary plan as well as analyzing the ideas we put forth in our Solutions section.	emc0040
131.	BLM is, of course, legally mandated to protect and preserve wild horse and burro herds. This sanctuary plan would do neither.	emc0040

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Comment No.	Comment	Cmt Ltr Code
132.	Dear BLM Officials, Other than the noted BLM list of issues, I am wondering what exactly is an Eco-Sanctuary. Is the proposal to put windmills or solar panels on our public lands?	emc0045
133.	My concern isn't what the sanctuary does on its own property but, what it does on our public lands. I have great concerns for the effects this might have on both our lands and wildlife. As much as I am an advocate for our wild horses they do destroy the land they share with other more sensitive species. We already have the largest population of wild horse in the nation. I'm not certain this is a good idea for Nevada.	emc0045
134.	I would like to express my support for the Eco sanctuary run by Saving American's Mustangs	emc0046
135.	The BLM should welcome help when it comes to managing the mustangs. The current BLM practices of taking away land, rounding up the mustangs, and then providing substandard care of my heritage is not acceptable. IN FACT IT IS BREAKING OF THE LAW!!!! I find it intolerable the lack of importance you place on these living creatures. And the inhumane way they are treated makes me sick.	emc0046
136.	I fully support the efforts of Mrs. Pickens to create a sanctuary for federally protected wild horses	emc0050
137.	If the agency assigned to maintain viable wild horse herd populations cannot accomplish that task for any reason, then there is no valid reason to deny the opportunity to a private individual who will utilize some private funds to celebrate these animals for the icons that they are. BLM's track record is unmistakable and the horses will in fact be eliminated during my lifetime without changes to the current system.	emc0050
138.	The Board of Directors of the Nevada Association of Counties adopted NACO Resolution 11-06 in August 2011. This resolution supports the "Wild Free-Roaming Horses and Burros Act" as written and opposes the creation of wild horse eco-sanctuaries. Please include the attached resolution in the public comments submitted regarding the creation of an EcoSanctuary in Elko County.	emc0054
139.	An awesome idea and opportunity for everyone, the wild horses having their freedom, folks enjoying their visit seeing and learning about the wild horses roaming free on the range. There should be many more sanctuaries including some on public lands to save all the wild horses! No more roundups.	emc0055
140.	An awesome idea and opportunity for everyone, the wild horses having their freedom, folks enjoying their visit seeing and learning about the wild horses roaming free on the range. There should be many more sanctuaries including some on public lands to save all the wild horses! No more roundups.	emc0055
141.	I am definitely for the Eco sanctuaries, and actually in opening one up myself.	emc0058

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142.	hope that BLM approves Madeline's request, as I feel very strongly that this first step is a step in the right direction in savings our Horses from being gathered based on scientific evidence and our tax dollars paying for them to be in short term facilities WITHOUT SHELTERS and being taken off their natural land given to them in 1971 and then placed in captivity in the Midwest only to be subject to hay feedings, water shortages and possibly inhumane slaughter.	emc0058
143.	If our Horses are kept in Eco sanctuaries our dollars would be better spent then they are now and it would be, in my opinion the better thing to do for the horses welfare. In my heart it isn't about the tax dollars as much as it is to do right by these magnificent creatures who are our gifts not livestock to be eaten or hurt.	emc0058
144.	I do not think this concept sets a precedence for other billionaires to come onto the public lands, buy up property and kick existing ranchers off the land. It is not a threat to modern day ranching.	emc0059
145.	SAM has a viable, affordable and humane answer for these animals. I do believe that you must agree with this.	fla0001
146.	I beleive that the ecosanctuary can do a better job than the BLM because they have the welfare of the horses as a priority where as the BLM has conflicting issues that interfere with their mission. This proposal from SAM is a win, win for the BLM and should be viewed as a positive move for both the BLM and those of us who insist that the mustangs be preserved as mandated by law..	fla0004
147.	I wholeheartedly support Madeline Pickens mustang monument ecosanctuary.	fla0007
148.	I very much want to believe that I can trust those in power to create an Ecosanctuary for the Northeast Nevada Wild Horses. This is an idea whose time has long since come.	fla0008
149.	Many people are working very hard for this. It's the least you can do to support the massive effort and stop the incredible waste of life and tax money.	fla0009
150.	Not only do my taxes pay for the horses (which they shouldn't because YOU keep removing them from their rightful home), it will pay for their upkeep at the Monument. I'll be able to see them which most of us want anyway.	fla0016
151.	This is a no-brainer. There is absolutely no reason not to support the wild horse ecosanctuary. It's a great solution for the vast number or horses held in captivity at great expense.	fla0018
152.	I live in Elko county and fully support this effort. I am sick and tired of cattle ranchers gettinig all the breaks. This is a great thing for wild horses and a good deal for the BLM.	fla0019
153.	The Wild Horse- an iconic symbol of freedom in America.Their legacy in our nation is integrated with out own- from being a part of the vibrant history of the Native Americans, to the westward movement of the pioneers. Without them the West would not be what it is today.	fla0029
154.	I believe that the current management of our wild horses and public lands is full of problems. I believe that the BLM does NOT take into consideration the public's view and opinions on how to deal with our wild horses. I do believe that a new	fla0032

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	plan needs to be supported and the goals of SAM's seem to be taking into consideration the welfare and humane management of our wild horse and herds.	
155.	I cannot wait to bring my family to see these amazing animals and be a part of the ecosanctuary. Please do the right things and allow this animals what they are so deserving of and what taxpayers, like me want for them. After all, you never asked me permission to round them up, which I oppose. No more excuses. Get it done.	fla0036
156.	The mother's that you have rounded-up with your helicopters have been separated from their babies. Please stop this devil from forcing you to do this unthinkable, evil, and sadistic act any longer. Return the mothers to their babies and deliver them both to the Ecosanctuary in Northeast Nevada.	fla0041
157.	I truly believe that what Madeline Pickens is doing is the proper way these horses should be treated.	fla0044
158.	All the taxpayer monies that are being spent on feeding and caring for these horses in the holding facilities and now you want to fence in at taxpayers expense 500,000 acres? Just let the horses roam free like they used to and eliminate the expenses that you are creating.	fla0044
159.	An eco-sanctuary would remove the remaining herds to safety from the collective machinations of the BLM and the large cattle operations' lobby.	fla0048
160.	My suggestion to the BLM is that they should not hesitate, but act IMMEDIATELY to accept SAM's proposal for a wild horse eco-sanctuary in Northeast Nevada. For the BENEFIT of the horses, burros, and the US taxpayer, it's wonderful that someone is taking the initiative to help relieve the ineffective policies established by the BLM.	fla0060
161.	The BLM should be banned from doing anything to wild horses as they act only in the interests of big money politics. A few thousand horses aren't too many when there are MILLIONS of cattle, sheep, oil wells, gas wells, mines, housing developments, etc trashing our public lands!	fla0062
162.	Perhaps there should be some real horsepeople on your board, someone that really understands horses. You would make fewer poor decisions regarding horses if that were true.	fla0063
163.	Saving America's Mustangs (SAM) has done a good job of stating their goals for the NE Nevada sanctuary. I will only say that I support the goals wholeheartedly. A holistic, natural setting seems the wisest for America's wild horses. Although we humans have had perfectly good intentions when interfering with nature in the past, often the natural rhythms have proven wisest in the long run. Let's provide a truly wild environment for America's wild horses.	fla0064
164.	Saving America's Mustangs (SAM) in northeastern Nevada and its founder, Madeleine Pickens, are to be highly commended for working towards the preservation of our wild horses and burros. It is important that the BLM respect SAM's work and cooperate with the ecosanctuary's efforts to help not only the wild horses, but in the last analysis, help	fla0065

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	BLM in what should be -- and is -- its mandate since 1970 to protect our wild horses.	
165.	I urge the BLM to work positively with SAM; SAM is a very viable and necessary part of preserving our wonderful wild horses and burros by rescuing already-captive horses from their holding pens and returning them to a more natural life. The SAM ecocanctuary should not be used by BLM as a screen to remove all our wild horses from the open range and our public lands.	fla0065
166.	I'm sure there is more than enough land in Nevada to sustain Cattle, Wild Horses and Burros. Some of the public owned land that has been taken from the horses needs to be returned and grazing allotments moved to different locations that won't interfere with the Wild horses and Burros. This ecosactuary is a good start in the right direction.	fla0070
167.	This is a model plan that could save thousands of horses. I myself have a place that I could offer our horses someday. Please let this be a role model for us all.	fla0071
168.	Madeleine Pickens' eco-sanctuary with gelded horses won't show the true nature of Mustangs as wild, free-roaming animals. They likely will be herded from area to area to preserve the forage much like livestock are managed. Madeleine's eco-sanctuary will be a place to put geldings that have been removed from their legal lands.	fla0074
169.	What is most feared is that she may well be encouraging the BLM to remove even more Mustangs from the wild. If that happens, Madeleine's eco-sanctuary or foundation will be equivalent to long term holding wherein animals are kept in same sex groups and are rotated from pasture to pasture; and the foundation will be paid some, as yet undisclosed, amount of taxpayer's money to house the horses.	fla0074
170.	However, one must question if this even is legal to do, to use the public lands and not her private lands, as all the other holding facilities are required to do? Three true sanctuaries or HMAs for true and free running Mustangs will be threatened toward extinction as she builds her publically paid for fences. These fences will deny these Mustangs their legal space, forage, and water for the future, forcing them to have to be removed from their HMAs.	fla0074
171.	Imagine how amazing It would be for tourists to go to her area to view both Mustangs preserved in their natural habitat on their rightful and legal HMAs as well as to see horses rescued from BLM corrals. Such eco-tourism is big business, and would draw animal lovers from all over the world for the thrill of watching American mustangs in the wild, iconic symbols of our Nation's freedom. But, the horses must be running in the wild, in their natural family groupings.	fla0074
172.	It's incredible how fast the BLM can remove wild horses & burros from their range lands but here we are 5 LONG YEARS down the road with no progress. Sad.	fla0081
173.	I fully support Mrs. Pickens' proposals and feel they are a win/win situation for the horeses and the American taxpayer.	fla0082
174.	Considering the Bureau of Land Management's recent efforts to ensure the eradication of wild mustangs from publicly owned range lands, I feel it is of paramount importance to ensure that there is an eco-sanctuary from which they can not	fla0084

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	be removed. The cattle industry has pushed and the BLM has gone with them on the removal of mustangs from most of their herd management areas on public lands to the point that the remaining mustangs are too few to be genetically sustainable over the long term. This MUST cease and a sanctuary must be provided in which wild mustangs may thrive.	
175.	Let her take them in and stop wasting my tax dollars on these removals and holdings.	fla0087
176.	I do not in any way, shape or form, support the proposed measures of the BLM to allow Madeline Pickens take the mustangs into sanctuary. I wrote earlier supporting her taking them in but I wish to clarify that the herds MUST be taken AND left INTACT! There cannot be any PERMANENT birth control methods such as sterilization. Their numbers are already too low and they face very real dangers from having such a limited gene pool. Stop using every possible excuse to zero out federally protected mustangs and burros!	fla0088
177.	Rather than keeping these poor creatures in holding areas, it would be widely supported to at least give this eco-sanctuary a chance to establish itself without endless red tape and rhetoric.	fla0090
178.	I support Mrs. Pickens' Ecosanctuary as it is proposed by her.	fla0091
179.	At the very LEAST allow the Ecosanctuary as MrS. Pickens proposes.	fla0091
180.	Fenced in horses are not, by definition, wild. Please stop obstructing the efforts of Madeline Pickens and other concerned Americans to keep wild horses breeding and roaming free on PUBLIC lands. Please remember you work for US!	fla0092
181.	We need to protect and save what is left of our wild horse herds. A ecosanctuary should not be used for the reduction of the herds, but to protect the horses from those who are trying to destroy them.	fla0093
182.	This wild horse eco-sanctuary will save the taxpayers of this country money at a time the federal government needs to save money. It is time for the BLM to approve and support a plan that is in the best interest of the horses and the taxpayers that are footing the bill. Please approve this plan and start saving some horses and money!	fla0095
183.	The intent of your proposals as always have nothing to do with responsible management but on the contrary will eradicate existing herd viability. It also portrays the sense that your approach is intentional in order to dissuade Ms Pickens from creating a ecosanctuary. This BLM's failed wild horse program lacks all accountability and defies all common sense and logic. It is this type situation that makes Americans loose faith in there government.	fla0101
184.	I can not validate this proposal based on a non-producing sanctuary. If you geld all the Mustangs and break up the bands and families you have done nothing but lengthen the time it will take to complete this genocide. I appreciate the desire to re-home those Mustangs in closed pen areas. Unfortunately I don't think they, the Mustangs, would appreciate it if it meant the decimation of their breed by gelding all their stallions and creating a non-producing herd, or by fencing off	fla0108

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	areas where wild herds still roam limiting their freedom and keeping them from being able to access water that the Geldings, Mares and other horses have plentiful access to.	
185.	Why would the BLM have any objection to a sanctuary is beyond belief. There are too many in holding pens now and this is an opportunity to release these poor, cruelly treated horses	fla0109
186.	ANYONE THAT IS TIRELESSLY TRYING TO SAVE THE FREEDOM AND LIVELIHOOD OF HORSES HAS MY SUPPORT.	fla0111
187.	We are so fortunate that Madeleine Pickens and Saving America's Mustangs have stepped up to the plate and are offering a compassionate, humane and common sense option for the wild horses, especially those in holding facilities. The BLM needs to also step up to the plate and work with Ms. Pickens to provide a win-win outcome for the horses.	fla0112
188.	The wild horse issue is very complex and goes beyond what can be addressed here. But it does offer a viable solution to a huge issue facing the BLM. What to do with horses that have been removed from public lands and now left to live the rest of their lives in dirt feed lot like holding facilities with no shelter from storms or sun.	fla0114
189.	It is critical that the BLM cease immediately its efforts to eradicate free roaming horses and burros that have been mandated by Federal law since 1972 to be free from the sorts of devastation that have been visited upon them by misguided policy interpretations.	fla0116
190.	I fully support a sanctuary for America's disappearing mustangs. Yet I believe that these horses should be left alone to live out their days in true wild freedom and that the BLM must stop kow towing to cattle ranchers and corporate interests and truly manage these lands as they are mandated to do.	fla0117
191.	The BLM should stop all roundups and leave the wild horses alone then allow people like Ms Pickens (a horsewoman of high caliber) to care for the ones in pens so you can GET OUT OF THAT BUSINESS. There are epractically no horses left compared to the millions of other cattle, sheep and other animals grazing in the west. These uses as well as gass/oil/mining/housing developments, etc, all should be stopped or restricted big time. There is not enough water for them and they trash the space we have left. Horses are the LEAST damaging of all these politically powerful horse trashing uses.	fla0122
192.	I only support the 'no-action' alternative; meaning, let Pickens do what she wants on her private land, but on public land HMA's...they belong to no one but the wild, natural, reproducing horses. I say NO to this proposal.	emc0064
193.	If she wishes to have herds of geldings on her own private property for her own pleasure or to save them from the lots, she should not be allowed public funds for fencing and special allowances from BLM for property rights.	emc0066
194.	Stop the division and destruction of OUR public lands from the dimishing cattle herds. Stop the unnecessary fencing. Let the Mustangs be.	emc0066

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Comment No.	Comment	Cmt Ltr Code
195.	Let's not continue to destroy our natural habitats and animals with more fencing and breeding control.	emc0066
196.	The scoping document prepared by BLM explains that the proposed eco-sanctuary would require an amendment to the Wells Resource Management Plan (RMP). It would require "restructuring the three existing wild horse HMA boundaries and revising management objects." As outlined in the scoping document and in public meetings, BLM would likely remove most or all the wild horses within the existing HMAs in order to accommodate the eco---sanctuary. This flies in the face of the Wild Horse & Burro Act, which requires that BLM manage sustainable wild horse and burro herds "where presently found" (1971). We anticipate endless litigation that could arise if these three HMAs are scheduled for destruction to accommodate a sanctuary as outlined in the scoping document and is counter to the intent of the original SAM plan.	emc0040
197.	We urge BLM not to accept this current plan or any future plan that would result in a loss of acreage to the wild herds and a subsequent reduction in population	emc0040
198.	We urge BLM to alter this eco-sanctuary plan (and any other plan that includes a legal wild horse or burro HMAs) so that it ensures the preservation of these unique, complex, and highly evolved herds of wild horses in these three HMAs and elsewhere.	emc0040
199.	With this goal in mind, we recommend the following: convert cattle animal unit months (AUMs) to wild horses on the Spruce Allotment. The AUMs would be added to the forage currently allocated for free-roaming wild horses in this area. The AML would be raised to allow for a self-sustaining population and would be flexible to accommodate a lower than anticipated herd, or a slightly larger than anticipated herd. Over time the numbers would even out as they do in any wildlife species.	emc0040
200.	Every female one year and older would be given the one-year dartable native PZP. PZP would function initially as a "predator." The drug would be administered during bait-trapping (no removal- mineral blocks as bait) in order to facilitate darting. There are knowledgeable veterans willing to assist SAM in this endeavor, supplying the sanctuary with help in planning, researching and organizing field work, in addition to recommending personnel and equipment for bait trapping and darting. College interns could participate in this process.	emc0040
201.	There would be no hunting of predators within the eco-sanctuary boundaries. The reversibility of PZP makes it ideal in a natural sanctuary. As mountain lions and other wild horse predators re-establish, a natural balance will take hold. PZP would be given more selectively to accommodate attrition by natural predators. The obvious goal would be a system in which wild horse mortality and reproduction are roughly equal. Combining predator protection with PZP would allow for a natural herd in which wild horse numbers would be stable within a revised, more genetically viable, flexible AML. The eventual goal would be no management.	emc0040

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	This alternative would allow the public to witness truly real wild horses behaving naturally in their native habitat. This would fit the definition of a true Eco-Sanctuary.	
202.	In our 2010 meeting with former Director Abbey, the Director discussed 5-7 million acres of previously zeroed-out acreage that could be reallocated to horses in long-term facilities. We did not come up with the 5-7 million acres available. BLM revealed this in a National BLM Advisory Board Meeting and later the Director discussed this with us. In our opinion, this is the best way to reduce long and short-term costs. We would welcome an opportunity to discuss this further with BLM and to assist in developing a plan for repatriation of horses into the zeroed out HAs or HMAs. Certainly the roundup and removal of horses as anticipated with the current plan will have little to no impact on the number of horses in short and long term holding. While geldings could go back in the sanctuary, the mares would be put in holding. The net result of perhaps releasing a few hundred geldings out of short term is really negligible.	emc0040
203.	BLM should include an alternative in the EIS that allows SAM to convert its livestock AUMs to wild horses in order to raise the AML for the HMAs.	emc0040
204.	Eco--tourists would embark from Sam's private acreage into the vast HMAs where they will experience the thrill of seeing real wild horse families and behavior, as well as the other wildlife of the area, including predators that might be easier to see, as they will not be hunted. This adventure would be a memorable and popular experience for people from around the world.	emc0040
205.	We applaud SAM's efforts to raise public awareness about wild horses, and encourage the analysis of the original SAM plan instead of this version.	emc0040
206.	While I applaud Ms. Pickens' efforts to create a horse preserve I am against the involvement of the public, through the BLM, in her plans. I would encourage her to use her private lands to care for as many horses as she can afford to. I would further encourage her to adopt wild horses rather than purchase domestic animals as she has done. However there is little to recommend the BLM's involvement in her operation.	emc0068
207.	Therefore, with no reasonable prospect of the proposed preserve leading to a long term solution to horse management on public lands, I am compelled to voice my opposition to it. I would encourage Ms. Pickens to provide care for as many adopted horses as she is able to, but I must recommend that the BLM take more serious, practical steps toward putting wild horse management on a sustainable, self supporting footing.	emc0068
208.	Please do not fence any public lands near the eco sanctuary jeopardizing the existence of our wild horses in HMA's. How can Wild Horses be considered wild when they are behind fences and restricted from grazing, roaming in natural habit and their free reproductive existence?	emc0070

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209.	I agree with R.T.Fitch; "These HMAs have to be preserved as they are, or be enhanced in any decision that is made concerning Madeleine's eco sanctuary promoting "Saving America's Mustangs." Wouldn't it be amazing to go to her area to view both Mustangs preserved in their natural habitat on their rightful and legal HMAs as well as to see horses rescued from corrals."	emc0070
210.	Please reserve the existing 34 million acres of the wild public lands where all the wild horses currently roam, restricting human use, development and livestock grazing to preserve and protect our wild horses and burros and their natural habitat.	emc0070
211.	I feel strongly that animals should have the Right to remain in their native land. Please protect them or allow them to go to a sanctuary!!!	emc0072
212.	The proposal does not appear to include relocation of captured wild horses currently residing on existing 'sanctuary' long term holding facilities currently under contract with the BLM. You may wish to specifically state this as a part of the proposed action.	emc0073
213.	The release preliminarily identifies five known areas of concern ... archeology, sage grouse/sensitive species, elk/mule deer/other wildlife, management of a healthy wild horse population, & public access for recreation. You may wish to expand this to include the continuation/dis-continuation of the function of other major land laws ...e.g. leasable/locatable/saleable mineral activities, ROWs & R&PP, watershed, special recreation use permits, etc. Further, there are probably Native American concerns that should be addressed. These comments are by no means all inclusive and depending on the participation during your comment period I am sure that others will come to light.	emc0073
214.	When you reach the stage of formulating alternatives to the proposal it would seem that the most logical array includes: no action; the proposal; an alternative that favors protection/maintenance of the environment - including the well being of the wild horses, and an alternative that favors production and economic return while providing minimum sustainment of the wild horse. Within the proposed action (the proposal) it is appropriate to include the current monitoring program and management practices associated with traditional management of public lands. Specifically, I am referring to stating that records will be maintained regarding actual use (class of animal, numbers, & season of use), utilization levels of key plant species, condition and trend data of the various ecological sites with emphasis on riparian areas, and climatological/weather data.	emc0073
215.	I am writing AGAINST the proposed eco-sanctuary for several reasons. 1. I do not see the justification for creating another HMA which is what this is doing	emc0077
216.	2. Private control of the land will impact the general public who uses the land.	emc0077

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217.	and most importantly it does not address the real issue of too many horses in holding and the money it costs to care for them. Money we don't have. Instead of a private entity creating a simulated wild heard and making money off of it why not have the BLM partner with someone to produce tours in the already established herd areas. This proposal adds more horse to an area already over populated and does not address the real issue. I feel the people proposing this are using horses to line their own pockets and this idea does not make any sense. The issue is reducing the horses in LTH and doing a better job of managing the range not creating new areas with different name and adding more horses.	emc0077
218.	Shipping hosrses overseas needs to be seriously considered until that happens the DOI and BLM are trying to heal an amputation with a bandaid	emc0077
219.	I applaud that fact that the BLM is sending wild horses to Ms Pickens property. We DO NOT want to see our wild horses harmed in any way. There are a lot of animal rights activists that are watching our government. They are suspicious of the BLM and their abuse of animals. A support of Ms Pickens Ecosanctuary will help the BLM,s image, which is not good lately. Check out some of the comments on Ken Salazars Facebook website	emc0079
220.	I am in favor of trying new approaches, but only new approaches that make sense. "Eco-Tourism" needs to have something "eco" in it. Eco-Tourism would be going to visit living, well-managed rangeland with wild horses living in balance and harmony with other multiple uses in a "thriving ecological balance." Eco-Tourism would make use of the marvelous, irreplaceable "living laboratories" offered by our wild herds, to study the horse as Nature designed it. A really good example of eco-tourism is Rock Creek Pack Station's Wild Horse Trips: http://www.rockcreekpackstation.com/mustangs.shtml	emc0080
221.	I am in favor of opening up abandoned land for groups of sterile horses from holding facilities, as an economical alternative to Long Term Holding. But I am NOT in favor of replacing three currently viable Herd Management Areas (Goshute, Spruce-Pequop, Antelope) with fenced-in geldings.	emc0080
222.	Your project is absolutely unacceptable. You plan to reduce the space left for the wild horses and burros, which is already smaller than what the law says. You plan to remove all the mares and sterilize the studs. What life is there left for them? Would the male employees of the BLM like to be separated from their wives and children, sterilised and stuck into an area with only men? Would the female employees of the BLM like to be separated from their husbands, sterilised and stuck in some "sanctuary"? If your answer to this question is no, then why do you think you have a right to do this to the wild horses and burros. They are fellow creatures and have a right to be on the planet Earth just as much as humans have. And to live a normal horse's/burro's life, to have a family and be free. I am not an American tax-payer, but if I were, I wouldn't want a single dollar spent on the BLM. Your work is just completely in opposition with the law of 1971 protecting these magnificent animals.	emc0081

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	Even if I have no saying, I disapprove your project profoundly and completely.	
223.	Would or could an adoption component be added since presumably adopting a horse from this location may add status.	emc0082
224.	The EIS needs to clearly identify what BLM will pay for and what is expected of the permittee. The agreement between BLM and the permittee should be subject to public review process prior to finalizing.	emc0082
225.	How will the public, the land and wildlife be protected if BLM and the permittee are in share a common view, BLM wanting to place more horses "somewhere" and the permittee eager to save horses and be paid for doing it?	emc0082
226.	Will the permittee be able to subcontract with BLM to adopt out horses on site? Perhaps a few yearlings, for instance?	emc0082
227.	While horses are publicly owned, they are a substantial drain on BLM's (i.e. taxpayer) financed agency and I hear BLM basically takes funds from other programs. In this case the permittee is capable of financing the entire operation. This project should not be a way of soak the public, i.e. another rancher welfare program and the first, perhaps "grazing for gain" program on public lands. BLM and the permittee are breaking new ground and will, I hope, provide new ways of managing public lands. My bottom line and concern is not for horses or for cows, both of which can be and have been destructive to soils, plants, and wildlife, which are increasingly vulnerable.	emc0082
228.	I lived in Wyoming for a while and was saddened by the BLM's poor management of the landscapes and wildlife there. I see it has gotten worse, not better, with short-sighted, private interest driven practices, and often involved horrifying scenes of well-documented animal abuse. There is an offer to take a tiny step forward by the BLM allowing the ecosanctuary proposed by Saving America's Mustangs (SAM) to proceed, all while not harming the existing wild horses that live in that area.	fla0049
229.	Consistent with a letter we sent to Secretary Salazar in October 2010, in these scoping comments we reiterate our clear position regarding the "Save America's Mustangs" proposed ecosanctuary. We continue to be strongly opposed to any future agreement that would include increasing any form of a herd management area (HMA) or artificially increasing appropriate management levels (AMLs). Specifically, we oppose any proposal to convert livestock Animal Unit Months (AUMs) or grazing permits to horse AUMs or HMAs or sanctuaries for wild horses. The solution to the overpopulation problem does not lie in expanding the problem to new areas. We have also expressed our position to Congress that current statute provides sufficient authority to effectively manage the wild horse and burro program.	emc0084
230.	While we fully recognize the need to address the problem of wild horse overpopulation on the range and the insupportable cost of keeping some 40,000 horses in holding pens, we do not believe SAM's proposal is the solution. Below are just a few of the concerns we believe should be considered when looking at alternatives:	emc0084

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	<input type="checkbox"/> We oppose any alternative that would convert public lands livestock allotments (which encompass portions of the proposed sanctuary boundaries) to an HMA or wild horse sanctuary.	
231.	Who will own these horses? It appears the U.S. Government will retain ownership of the horses while compensating SAM for management of the horses. This raises many legal questions which must be satisfactorily answered prior to any final decision by the BLM. One such question is whether water rights may be retained if livestock AUMs are converted for use by federally-owned wild horses. Nevada state water law requires beneficial use of private water rights on the range to maintain the water right. Without owning livestock, how will the BLM or Mrs. Pickens prove beneficial use? The BLM cannot legally own livestock, and SAM cannot put the private water to beneficial use unless it holds title to the horses--in which case the horses would be reclassified as domestic. Certainly, the agency would not contemplate paying for the management of private domestic horses on public lands.	emc0084
232.	Local and county governments, state grazing associations, and national livestock groups should play a primary role in direction and planning, should a sanctuary indeed be developed. The people working "on the ground" are most knowledgeable of and adept at dealing with the challenges presented by wild horse overpopulation. These local stakeholders would be directly affected by a reduced tax base and a diminished resource. PLC and NCBA look forward to representing our members, the stewards of our public lands, in working with the Department of Interior, including the BLM, to implement sound management of the wild horse and burro program.	emc0084
233.	Such sanctuaries should be on private land or if on public land they should not be on the legal areas that were designated for the wild horses and burros. Such is simply not acceptable and would set a dangerous precedent that could result in many other of the legal herd areas/herd management areas (BLM) and territories (USFS) being filled with dead-end, devitalized horses and burros who have lost their natural freedom and are no longer reproducing and adapting in a truly natural manner to their unique habitats and over the generations. This is entirely contrary to the core intent of the WFHBA! If this is allowed, I plan to legally protest this.	emc0085
234.	Cooperative agreements should be established under Section 6 of the Act to assure adequate forage and water, as well as shelter and habitat space for the establishment of truly long term viable wild horse population(s).	emc0085
235.	I would like to propose that Madeleine Pickens and the BLM adopt a Reserve Design strategy for both the private and the public leased lands that would promote naturally self-stabilizing herds that are reproducing. This can be done, but it would require some sacrifices on the part of us humans and our customary exploitations of the public lands. But it would sure be worth it to see the wild horses realize their full and fitting place again in the world. -- And this would be a world-wide attraction truly worth celebrating ... a true "wild horse ecosanctuary" deserving of the name!	emc0085
236.	The federal government holds the Spruce Mountain Allotment (99.973% federal land) and the horses in trust for the American people. Under these circumstances why would the BLM abdicate their responsibility and authority over to Mrs.	emc0086

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	Pickens or her organization to manage these horses alone or allow the Pickens organization to define and portray the historical story of wild horses in the West?	
237.	<p>This proposed alternative and approach to resource management, decision-making and conflict resolution, has proven to be a successful tool and strategy. This facilitated team model is in alignment with the BLMs own stated position. Since Range Reform in the mid-1990's the concept of a facilitated adaptive management team approach has been a reoccurring agency theme, and it is an on-the-ground reality around the West.</p> <p>On March 25, 2011, the BLM issued CFDA (No. 15.229) and titled Wild Horse Partnership for Eco-Sanctuaries on a Combination of Public and Private Lands. Under Part B., "Project specific objectives include:</p> <p>2.c. To provide care (of horses) by partnership organization who are knowledgeable and experienced about the behavior and nutritional requirements of equines and the management of the land they inhabit for the sustained production of grass and other desirable forage plants."</p> <p>What could better fulfill this objective than a diverse, multi-disciplinary group of individuals to help guide and inform the management that this project requires? This approach would couple best science with local knowledge; a sound combination that would insure the health and welfare of the horses and other wildlife, create long-term sustainability of the resources on the Spruce Allotment, and be more likely to ensure economic benefits to the local community. A knowledgeable team approach would ensure adherence to the BLM's Standards and Guidelines and the Standards of Rangeland Health. Examples of these success stories are the Diablo Trust in Flagstaff, Arizona, the Blackfoot Challenge in western Montana, the Malpai Borderlands Group in southwestern New Mexico, and the Blue Mountains Forest Partners in John Day, Oregon.</p> <p>This proposed alternative and approach to resource management, decision-making and conflict resolution, has proven to be a successful tool and strategy. This facilitated team model is in alignment with the BLMs own stated position. Since Range Reform in the mid-1990's the concept of a facilitated adaptive management team approach has been a reoccurring agency theme, and it is an on-the-ground reality around the West.</p> <p>On March 25, 2011, the BLM issued CFDA (No. 15.229) and titled Wild Horse Partnership for Eco-Sanctuaries on a Combination of Public and Private Lands. Under Part B., "Project specific objectives include: 2.c. To provide care (of horses) by partnership organization who are knowledgeable and experienced about the behavior and nutritional requirements of equines and the management of the land they inhabit for the sustained production of grass and other desirable forage plants." What could better fulfill this objective than a diverse, multi-disciplinary group of individuals to help guide and inform the management that this project requires? This approach would couple best science with local knowledge; a sound combination that would insure the health and welfare of the horses and other wildlife, create</p>	emc0086

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	long-term sustainability of the resources on the Spruce Allotment, and be more likely to ensure economic benefits to the local community. A knowledgeable team approach would ensure adherence to the BLM's Standards and Guidelines and the Standards of Rangeland Health.	
238.	<p>2. BLM should retain responsibility for telling the story of the wild horses on public lands in Nevada by recruiting a team of national and local experts. My second concern arose from the following statement, "SAM would also provide Western history and wild horse related education...". This is an unacceptable abdication of responsibility by the BLM, the governing agency. Mrs. Pickens has shown little responsibility or accountability in representing the historical truth about wild horses in the West. She has repeatedly depicted the local ranching community in a very demeaning light. For example, she compared local ranchers to the characters in the movie, "The Misfits," in front of southern California civic groups. The BLM holds a grave responsibility to the public and to posterity to guarantee that historically accurate and scientifically sound facts are the narrative that guide visitors through the sanctuary whether through the written word, oral histories, or visual depictions out on the public rangelands.</p> <p>The interpretation of the interrelationship between private and public land and the historical context of indigenous tribes, ranching, mining, the cultural, societal and economic story of rural Nevada demands and deserves a scholarly pursuit. The public at large deserves accuracy, as do local residents who are the backbone of the local community and economy. I propose that a team comprised of humanities scholars, trained cultural interpretation specialists and vested community voices be created to develop the narrative of the wild horse in Nevada. Examples of historically accurate narratives can be found in historical interpretive centers across the nation. The narrative accompanying this Eco- Sanctuary is no exception and is an opportunity that cannot be left to any biased or agenda driven group.</p>	emc0086
239.	<p>1. Status of wild horses: Will the wild horses in the sanctuary continue to be owned by the BLM (and the American public) or will ownership be transferred to Saving America's Mustangs (SAM)? Would SAM be a "permittee" similar to those with livestock grazing permits, even if it does not "own" the wild horses? How does this arrangement comply with existing federal laws and regulations on federal permittees, or do laws have to be changed? Is the wild horse sanctuary an experimental arrangement or is it permanent; i.e., would a permit run for 10 years or indefinitely?</p>	emc0087
240.	<p>5. Financial: Is BLM paying the sanctuary operators to manage the wild horses? If so, what is the annual amount per horse? How was this calculated? Is it sufficient to cover management expenses, including the costs of environmental protection? If not, how will operations and management shortfalls be covered and by whom?</p>	emc0087
241.	<p>7. Management: We are interested in how the sanctuary wild horses will be managed, especially if the management is different from BLM's current management. The assumption is that the horses will be managed "better" than the BLM is capable of, but we would like to see the details of the proposed management plan, especially the management goals and objectives. Certainly, the environmental impacts of any proposed management plans for the sanctuary horses must meet</p>	emc0087

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	NEPA requirements and be analyzed in the EIS, especially impacts on native wildlife, Sage Grouse and other threatened, endangered and sensitive species, wilderness, cultural resources, including the rich history of homesteading on the allotment, as well as other public access and uses of the Spruce Allotment. The EIS should also study the impacts of the proposed management plan on the wild horses and how the sanctuary horses will be managed in "thriving natural balance" with the public lands and resources on the Spruce Allotment. Will the sanctuary be a "retirement ranch" for wild horses, to be kept there until their natural deaths? Or will wild horses be available for adoption either within or outside the BLM adoption program? Will sanctuary horses be managed to meet grazing standards and guidelines in the Elko District? If not met, what are the penalties and how will management change to meet these requirements?	
242.	1)The public is being asked to comment on a proposal done by Madeleine Pickens for her private 14,000 acre land and for her public allotment area of 508,000 acres in the Elko District in NE Nevada. This proposal has to do with BLM wild horses. However, the public is not being allowed to read the initial proposal with the BLM saying the public doesn't have privy to the contract until it is final. As such it is difficult to make thorough, intelligent comment(s) on the proposal as the comments are based on hearsay from Brian Fuell, Fd. Mgr. for the Wells District, from Zach Reichold, National BLM State Lead, from Madeleine Pickens in her recent letter to the public, and from a BLM Document titled "Proposed Northeast Nevada Wild Horse Eco-sanctuary." The public should have access to the full disclosure of this proposal.	emc0089
243.	1)The objective(s) of this proposal is not clear and should be made more clear to the public. Madeleine has said in her recent letter to the public she wants to take horses out of the corrals and put them in a more natural setting. From what the BLM said these horses will be geldings only. The taxpayer will pay for a part of the fences around the 508,000 acres and the public will pay for the yearly management of the horses.	emc0089
244.	2)Except for the payment of the fencing this proposal fits within the category of a long-term holding facility. 3)Needed is to differentiate between a long-term holding facility and an ecosanctuary. 4)Needed also is to define the meaning of an "eco-sanctuary."	emc0089
245.	Long range potential downsides need to be addressed in this EIS. What happens if and when the BLM budget is slashed down from \$77M. Then how is the management of the horses paid by the public or are they just slaughtered.	emc0089
246.	A proposal is to have a reproducing herd comprised of the horses from Spruce Pequop, Goshute, and Antelope Valley within the 508,000 acre allotment. Give up the 6% of Spruce Pequop HMA which is out of the allotment already and 14% of Antelope Valley HMA which is in the allotment. Acquire all of the Goshute HMA . Increase the AMLs for Spruce Pequop, Goshute, and Antelope Valley so that the number of horses on Madeleine's allotment come to somewhere around 450- 500 horses or less. Perhaps even introduce some horses from the corrals. Consider somewhat less horses so that you can allow for yearly growth. Then do birth control in the right number at the right time. As or if overpopulation seems a possibility, set up an adoption, gentling site right at Madeleine's facility and market horses as	emc0089

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	<p>unique from her place. Allow visitors to view at observation points the true behavior of Mustangs. Have researchers involved in observations and experiments with different population methodologies, and veterinary students also involved in population suppression techniques. Allow visitors to view at observation points methods of gentling wild horses. More personnel may be needed instead of that with just 500 gelded horses. That cost would need to be worked out as well. In this alternative everyone would have something, the cattlemen having the horses contained and having some land, Madeleine, "Saving the Mustangs" in Spruce, Goshute and Antelope Valley, researchers having a ready contained population for researching and experimenting, and the visitors seeing what Mustangs are really like.</p>	
247.	<p>The proposal is to create a sanctuary for unwanted horses. To be sustainable, the sanctuary would need to be more cost efficient than the current long-term holding facilities. The expense of the fence construction and its maintenance would make this proposal very expensive. Add to this, the stipend of \$500 per horse per year and I would be very interested to see the economics that allows this proposal to be viable. I cannot understand the public paying a private company to graze public horses on public lands. If she would take ownership of the horses and run her proposal at her own expense, all of my concerns would be void.</p>	emc0090
248.	<p>Stop destroying wild horse herds by removing mares and gelding stallions.</p> <p>Check out this URL: http://www.wildhoofbeats.com/blog/wild-horses-the-blm-must-not-be-allowed-to-destroy-wild-herds-for-eco-sanctuary - Link Added in References Received in the 5_Background</p>	flb0000
249.	<p>I support Saving America's Mustangs' (SAM's) goals for the creation of a wild horse "eco-sanctuary" in northeastern Nevada. These goals include: returning horses currently held in BLM short-term holding facilities to a natural habitat environment; utilizing the public lands in the Spruce grazing allotment for the benefit of horses; and creating an eco-sanctuary that highlights the importance of wild horses to American history and culture.</p>	flc0000
250.	<p>I strongly believe that these goals CAN AND MUST BE accomplished without negatively impacting the wild horse herds living in the three Herd Management Areas (HMAs) that comprise the Antelope Complex and will be affected by the proposal.</p>	flc0000
251.	<p>Since 1971, wild horses have been zeroed out from 111 herd areas representing over 20 million acres; this represents nearly half of the habitat originally designated for wild horses and burros under the Wild Free-Roaming Horses and Burros Act. In 70% of the remaining herd management areas, BLM's population targets are set at levels that will not ensure genetic viability. Given these numbers, any proposals for ecosanctuaries or holding facilities that result in a net loss to existing populations explicitly undermine the goals of wild horse preservation and the Wild Free Roaming Horses and</p>	flc0000

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	Burros Act.	
252.	Further, please include a preferred alternative in the Environmental Impact Statement (EIS) that will leave all wild horses in the Antelope Complex intact by not requiring the total fencing off of the Spruce allotment and allowing Saving America's Mustangs to replace cattle with gelded horses from BLM holding facilities on the public lands portion of the sanctuary.	flc0000
253.	I support creation of a sanctuary where horses otherwise residing in holding facilities can live and roam. However, I object to any attempt by the BLM to use an "ecosanctuary" as an excuse for reducing the number of wild horses who are protected under federal law and/or the acreage available to them.	flc0000
254.	Although I supported the original intent, the Eco-Sanctuary Plan - as forwarded by the BLM - is not now, and can never be acceptable. For in it horses are subject to loss of water, loss of life and reproducing families, loss of habitat and the disappearance of HMA's which are already existing tax payer supported sanctuaries. This plan would set one of the most disastrous precedents for the future of wild horses since the protective law was put into place in 1971, and is about as far from First, do no harm and the 1971 Wild and Free-Roaming Horse and Burro Act as you can get.	flc0002
255.	Any proposal to remove existing wild horses to make room for already rounded-up geldings on public lands is not only wrong-headed, but unethical, unlawful, not in the best interests of the animals removed, and will be ripe for intense litigation.	flc0002
256.	I support wild horses and burros on those rangelands designated for them based on a fairer allocation of resources on public lands. I support implementation of in-the-wild management, which would keep wild horses and burros on the range and save taxpayers millions of dollars annually by avoiding the removal and stockpiling of wild horses in government holding facilities.	flc0003
257.	Please reconsider your plan to sterile 3 wild herds for the sake of an eco-sanctuary. In your Scoping Project Brief, http://www.blm.gov/nv/st/en/fo/elko_field_office/blm_information/nepa/nenvwh_ecosanctuary.html , you indicate that in order to set up the eco-sanctuary, you are considering removing all of the mares from the Spruce Allotment, gelding all the stallions, and also removing the mares and gelding the stallions in the surrounding Antelope and Goshute HMAs. This would mean the complete destruction of three wild horse herds in Nevada! You MUST NOT take this action, it would set a very dangerous precedent for sterilizing and zeroing out wild horse herds all over Nevada and the rest of the western United States, and replacing them with sterile herds of unrelated horses. Such actions GUARANTEES Their eventual extinction! This is not what the citizens of the United States of America want for our herds of wild mustangs, and not what we want used as a model for managing our wild mustang herds.	fld0000

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258.	Once again, the purpose of this eco sanctuary is to PRESERVE wild mustangs! But what you have proposed will ensure their complete eradication after one generation and this is NOT acceptable!	fld0000
259.	I do not support the eco-sanctuary on public lands if it will house a non-natural, non-productive herd of gelding in an almost identical setting as long-term holding. Especially if it requires the permanent removal of hundreds of mares and foals, who will very likely go to the short and long-term holding facilities SAM's proposal wishes to save horses.	rmc0001
260.	As Chairman and spokesman of the N-I Grazing Board, it is our responsibility to support and sustain economically viable operations within the N-I Grazing District and maintain healthy range conditions. Therefore, the Wild Horse Sanctuary would eliminate approximately one-half million acres from our district, and over 13,000 AUMS. For this reason, we offer the following comments for consideration and believe that the Taylor Grazing Act must be adhered to:	rmc0002
261.	We support the need for the American Public to be made aware of all issues pertaining to public land. However, this plan does not support multiple uses of public lands, contribute to the economy or support the goal of a healthy rangeland open for the enjoyment of the American Public. As a result, we strongly recommend not removing this area from the N-I Grazing District and the grazing permits not be retired.	rmc0002
262.	Thank you for considering the comments of the N-I Grazing Board. We are proud of the range improvements we have been able to participate in with the cooperation of the BLM and believe that if removal of the AUMs becomes a trend, the loss of revenue will be detrimental to the over-all health of the range and habitat for wildlife.	rmc0002
263.	Elko County has completed our initial review of the proposed Northeast Nevada Wild Horse Eco-Sanctuary Scoping Brief. Elko County is not opposed to the proposed use on the 14,000 acres private land but we have several concerns and problems with the proposed uses on 508,000 acres of Federally Managed public lands. As per your scoping document the following statements presents concerns to the Elko County Board of Commissioners;	rmc0003
264.	Question: Isn't the BLM currently responsible for the management of the wild / feral horses? Why would the BLM elect to pay an additional \$500 per horse for management to a 501 (C) 3) Corporation for management services already provided by the BLM?	rmc0003
265.	Elko County agrees that the Eco-Sanctuary is proposed in a very important and critical environmental, archaeological, recreational and wildlife area including populations and habitat of sensitive species petitioned for listing.	rmc0003
266.	The diversity of wildlife and multiple use opportunities are critically important to Elko County's culture and economy. Elko County believes that the proposed purposes of permitting additional wild / feral horses to graze federally managed public lands will cause continued and additional destruction of resources and wild life already being destroyed by the current over population of wild / feral horses and burros within the HMA's. The proposed will serve as an increase the herd numbers of wild / feral horse in the region. The proposal calls for the construction of fence to be placed along the boundary of the proposed re-aligned HMA and provide water sources for the wild / feral horse. The proposal also states	rmc0003

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	that SAM will provide management of the eco-system. However, the questions arise; If any of the wild / feral horses contained within the Eco-System escape to the adjacent HMA's; Will the BLM find SAM in tress-pass? Will the BLM enforce the tress-pass as they would for a privately owned cattle rancher?	
267.	Elko County is adamantly opposed to the proposed eco-sanctuary on federally managed public lands due to the potential negative impacts implied by the increased numbers of wild / feral horse to be introduced by this proposal and other issues presented herein.	rmc0003
268.	Elko County as per this letter of comment officially requests that we be included as a coordinating / cooperating agency status.	rmc0003
269.	Elko County also requests that a full Environmental Impact Statement be prepared to include consideration of the water rights, economic impact, cultural, wildlife, Sage Grouse, Pygmy Rabbit, Columbia Spotted Frog and their habitat, humanitarian, ecological and environmental issues that Elko County has identified herein.	rmc0003
270.	The Elko County Board of Commissioners are including with our comments an Environmental Assessment prepared by Mr. Cliff Gardner entitled "Elko County Wild and Free Roaming Horse and Burro Management Draft Environmental Assessment" for your consideration during the scoping process and development of the Environmental Impact Statement concerning the proposed Eco-Sanctuary.	rmc0003
271.	If Madeleine Pickens, whose husband says she has unlimited resources available for this project, was genuinely concerned about the plight of the wild horses in the West, she would propose funding the establishment and operation of this sanctuary at her own expense rather than asking the United States tax payers to provide the means to make her "dream" come true. The fact is that Mrs. Pickens' theoretical dream has every potential to become a nightmare in reality.	rmc0005
272.	It is my opinion that there is no business oriented organization that would give serious consideration to a proposal that is so ill conceived with respect to economics, the environment and multiple use considerations. That the United States government would do so is astonishing. I also believe that the local government employees who know the realities of this proposal also recognize its folly. I hope that sound judgment will soon prevail upon decision makers behind this proposal to see it for the boondoggle that it is and stop it.	rmc0005
273.	As in prior letters, this RAC continues to recommend that the eco-sanctuaries be viewed as a temporary holding facility in which BLM's support will end at a date certain. We suggest that BLM ask the eco-sanctuary owner to absorb ownership of the horses over time. For example, the sanctuary would be required to take ownership of 10% of the horses per year over the course of 10 years. This is truly the only way to reduce the costs of long-term holding and put the wild horse and burro program back on budget. In addition the private owner will be able to incorporate sponsorship programs for horses on the range as well as have the opportunity to receive grants and should not need BLM's support indefinitely. There are	emc0095

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	several mustang rescue groups that are currently operating without BLM subsistence. For example, the National Mustang Association, Inc. is a non-profit rescue organization that cares for 72+/- mustangs in Barclay, Nevada. The National Mustang Association owns private land to support these horses in conjunction with leased public lan9 that hold a horse allotment on it. They pay AUM'S based on the number of horses that can be turned out on public lands which at the current time is 25 horses for 6 months per year. They have incorporated a "sponsor a horse for a year program" in which anyone around the world can sponsor a horse for \$300 per year. This has been successful in helping to offset expenses and allows them to care and support the horses without government support. In fact, under this scenario, they pay for their AUM's and are a source of revenue for the BLM and local governments. This is a model we recommend BLM look at for this area.	
274.	As in prior letters, this RAC continues to recommend that the eco-sanctuaries be viewed as a temporary holding facility in which BLM's support will end at a date certain. We suggest that BLM ask the eco-sanctuary owner to absorb ownership of the horses over time. For example, the sanctuary would be required to take ownership of 10% of the horses per year over the course of 10 years. This is truly the only way to reduce the costs of long-term holding and put the wild horse and burro program back on budget. In addition the private owner will be able to incorporate sponsorship programs for horses on the range as well as have the opportunity to receive grants and should not need BLM's support indefinitely. There are several mustang rescue groups that are currently operating without BLM subsistence. For example, the National Mustang Association, Inc. is a non-profit rescue organization that cares for 72+/- mustangs in Barclay, Nevada. The National Mustang Association owns private land to support these horses in conjunction with leased public lan9 that hold a horse allotment on it. They pay AUM'S based on the number of horses that can be turned out on public lands which at the current time is 25 horses for 6 months per year. They have incorporated a "sponsor a horse for a year program" in which anyone around the world can sponsor a horse for \$300 per year. This has been successful in helping to offset expenses and allows them to care and support the horses without government support. In fact, under this scenario, they pay for their AUM's and are a source of revenue for the BLM and local governments. This is a model we recommend BLM look at for this area.	emc0095
275.	The Mustang Monument, while seemingly a fine original concept, has developed into a very poor proposal that will only harm the population it was purported to protect.	emc0097
276.	The Eco Sanctuary is not a plan that will sustain healthy mustang herds. It is an elaborated plan for extinction.	emc0099
277.	The Mustang Tombstone Eco-Resort is a NO GO in the eyes of the American public and we citizens respectfully ask Mrs. Pickens to go back to the drawing board and come up with a plan that STOPS the BLM from unnecessarily removing wild horses from their rightful land versus warehousing the victims of the atrocities and enabling the BLM to continue their destruction of our national icons, the wild horses and burros of the west.	emc0100

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278.	<p>In preparation for an EIS, the following proposal would have the least impact upon wild horses, sage grouse, elk, deer, antelope, and other wildlife, the environment, and still would accomplish the admirable goals of the Pickens Eco-Sanctuary.</p> <p>Amending the Wells RMP would require only one change which is the retirement of the portion of the Spruce Grazing Allotment east of U.S. Hwy 93 from the NI grazing district keeping the 10,903 active AUMs which would be allocated to the three HMAs known as Antelope Valley, Goshute, and Spruce-Pequop by use of the Spruce Allotment.</p> <p>The designation of AUM's to the three existing HMA's would allow for the expansion of the wild horses from the current 1,384 animals to approximately 1,569 thus eliminating the need to alter the HMA's which would potentially result in the loss of all or nearly all the horses in the these areas as free-roaming reproducing animals.</p> <p>This proposal has the following advantages for all parties involved:</p> <p>Animals:</p> <ul style="list-style-type: none"> • Elimination of the need to fence the allotment would permit the continuation of migratory routes for all wildlife including wild horses allowing for movement to winter and summer habitat areas and providing necessary water sources for the animals. • Death loss of wildlife due to loss of migratory routes due to fencing would be nearly eliminated. • Three important HMA's would be preserved maintaining and allowing for more ingress and egress of the wild horses thereby keeping a healthy genetic pool of animals. • Wild horse families (harems) would not be broken up causing devastation to the well being of the animals who naturally have strong social bonds. <p>Sanctuary:</p> <ul style="list-style-type: none"> • There is a great cost savings in eliminating fences or building new fences. • Maintenance of fencing, which would have to be a near daily occurrence, would be eliminated. • Conflict would be eliminated with wild horses from the HMA's going through fences on the Spruce Allotment and intermingling with the non-reproducing horses on the allotment. <ul style="list-style-type: none"> • Elimination of fences would be in keeping with overall esthetic view of a vast wilderness which is appealing to eye of the beholder. • Tourism is much more effective allowing visitors to watch natural behaviors of reproducing horses rather than same sex animals that appear to be nothing more than viewing pasture horses. • Tourism can also include viewing other wildlife such as deer, elk, and antelope which would be free to migrate through the allotment. 	emc0101

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	<ul style="list-style-type: none"> • Support for this proposal amongst the wild horse advocates would be more than likely unanimous. <p>BLM and other federal agencies:</p> <ul style="list-style-type: none"> • There would be a cost savings in rounding up, castrating, and eliminating animals from the three HMA's. • There would be an annual cost savings of \$450,000 for long-term holding of 900 animals that would not be coming from short or long term holding areas in the Midwest but would be comprised of the horses within the three HMA's involved. Considering the life of the animals that could live twenty plus years, there would be a savings over 9 million dollars over their lifetime. • There would be a reduction in conflict or potential law suits from parties who oppose the elimination of all or part of the three HMA's which would be in violation of the PL 92-195. • BLM's monitoring of wildlife workload would be decreased if migratory routes would not be disturbed with added fencing preventing unnecessary die off of animals. • USF&W would be assured that the Speckled Dace fish would flourish with other water sources available to wild horses and wildlife. <p>Taxpayers and the Public:</p> <ul style="list-style-type: none"> • Elimination of the removal of an additional 900 animals from the three HMA's would reduce taxpayer's cost to pay for the additional animals. • A savings to the taxpayer's would be recognized in not rounding up and castrating horses in the three HMAs. • The public would much rather see that wild horses would not be harmed by a sanctuary proposal that eliminates more HMA's or reduces the HMA's to non-viable numbers of animals. • ISPMB's proposal for an EIS preferred alternative would be looked upon favorably by the public who would support both the Pickens plan and the BLM's alternative. <p>In conclusion, ISPMB could not support any wild horse loss in the three HMA's, the elimination of any of the HMA's, or the loss of the migratory routes due to fencing that would restrict water availability and winter and summer habitat for the horses.</p>	
279.	I am absolutely opposed to a plan involving the removal of wild mustangs surrounding Madeleine Pickens' land in order for her to have a place where visitors can see her gelded horses in an unnatural setting.	emc0102
280.	Please do not go through with a deal that would be bad for the free roaming horses. They deserve more than just becoming a byproduct tragedy for money.	emc0102
281.	We at DreamCatcher recognize and support Madeleine Pickens' vision and goals for SAM to restore captured wild horses in short-term holding to the natural habitat land and life of freedom they were born into. Her project seeks to benefit them, but the conditions BLM has imposed upon the SAM sanctuary would result in net harm to present and future wild	emc0107

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	horses living on the three subject HMAs, namely, Spruce-Pequop, Goshute, and Antelope. Therefore, with profound disappointment we find we cannot support the plan as presented by BLM.	
282.	<p>First, for clarification purposes, we recognize and support Saving America's Mustangs' goals and intention to:</p> <ol style="list-style-type: none"> 1) create a wild horse "ecosanctuary" in northeastern Nevada replete with educational opportunities to learn about the important role horses and burros play in our American history; 2) restore to their native habitat, or restore to freedom from pen living, captured wild horses presently living in BLM or BLM-contracted short-term holding facilities; 3) retire the livestock grazing permits on the Spruce allotment so the permittee (SAM) may utilize the allotment for the benefit of wild horses, that is, turn over the grazing permits on the Spruce allotment such that it will be devoted principally but not necessarily exclusively to [the wild horses' and burros'] welfare in keeping with the multiple use management concept for the public lands pursuant to the 1971 Wild Free-Roaming Horse & Burro Act (Public Law 92-195, Sec. 1332©). 	emc0107
283.	<p>DreamCatcher Wild Horse & Burro Sanctuary recommends:</p> <ol style="list-style-type: none"> 1. that BLM amend its solicitation for an entirely nonreproducing sanctuary/herd on an HMA because the concept is contrary to existing law, and we believe it to be illegal on its face; 2. that BLM include a preferred alternative in the Environmental Impact Statement (EIS) that will leave all wild horses, including mares, in the Antelope Complex intact by not requiring the total fencing off of the Spruce allotment and the sanctuary boundaries; 3. that BLM retire the cattle/livestock grazing permits on the Spruce HMA and allow SAM to utilize those AUMs for the benefit of the wild horses presently dwelling thereon, thereby increasing the AMLs for the Spruce-Pequop, Goshute, and Antelope HMAs. With SAM's continued presence to monitor these herds, the possibility then exists for BLM to do selective PZP administration and studies to help secure a stable, healthy population while maintaining genetic diversity; 4. that geldings from BLM holding facilities be introduced and maintained on the sanctuary's private land while leaving the present wild horse populations on their home ranges as stated in no. 3, above. This scenario creates true educational opportunities for SAM to share with the public, overseeing and conducting tours in the HMAs which would continue to be home to herds and natural family bands in a true thriving natural ecological balance (TNEB), which includes wild, free-roaming horses living in their natural element and social structure. <p>Implementation of these recommendations will create a win-win situation for all concerned in that these recommendations support:</p> <p><input type="checkbox"/> SAM's goal to restore to freedom captured wild horses living in pens;</p>	emc0107

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	<p><input type="checkbox"/> they support the wild horses in the wild so that none loses his/her life and freedom for the sake of a "sanctuary," and none loses access to water or historic migratory routes;</p> <p><input type="checkbox"/> they support a thriving natural ecological balance because the natural balance of the wild horse herds is not being tampered with by removal of mares, nor are the herds being inundated with massive numbers of geldings on an HMA;</p> <p><input type="checkbox"/> they support the 1971 Wild Free-Roaming Horse and Burro Act by devoting a range principally but not exclusively to the wild, free-roaming horses managed with minimal feasible management strategies;</p> <p><input type="checkbox"/> and they support the Bureau of Land Management in developing new, sustainable ways to protect and manage wild horses in the wild rather than resorting to repeated helicopter roundups;</p> <p><input type="checkbox"/> they support the 1971 Act by leaving the HMAs intact as HMAs instead of turning them into glorified longterm holding pastures, which would virtually certainly not go unchallenged in court;</p> <p><input type="checkbox"/> they support, at last, true multiple use, with wild horses as the principal but not exclusive user as indicated above. True multiple use with the SAM Sanctuary in place can be an outstanding first of its kind if BLM will take these recommendations and allow SAM to oversee the existing HMAs and develop tours and educational opportunities to see the wild horses currently living on the Spruce-Pequop, Goshute, and Antelope HMAs. With no livestock grazing, and a concurrent increase in wild horse AMLs, the thrilling tours available to the public as they watch real wild horses in the wild are bound to have a very positive impact on the local economy.</p> <p>I can personally attest to how difficult it has become to even find bands of wild horses in the wild after BLM's massive roundups. So this is an opportunity BLM should not miss, and the "geldings in the wild" plan truly pales in comparison to the wonderful opportunities that await SAM and BLM if you let the horses just be horses on their home ranges.</p>	
284.	<p>Although DreamCatcher supports SAM's original intent, the Eco-Sanctuary Plan as presented by the BLM, including all "alternatives" presented, is not now, and can never be, acceptable. For in it horses are subject to loss of water, loss of life and reproducing families, loss of habitat and the disappearance of HMAs which are already-existing, taxpayer-supported sanctuaries. This plan would set one of the most disastrous precedents for the future of wild horses since the protective law was put into place in 1971, and is about as far from First, do no harm and the 1971 Wild and Free- Roaming Horse and Burro Act as you can get.</p> <p>However, a great potential exists for a true ecosanctuary as outlined in our Recommendations, above, and we would be thrilled to see SAM have that opportunity.</p>	emc0107
285.	<p>I have been asked to submit comments regarding the Madeline Pickens Wild Horse Eco Sanctuary. And my comment is this: STOP! Don't do it! This is a death sentence for the horses that call the three Herd Management Areas home.</p>	emc0108
286.	<p>I do not condemn Mrs. Pickens who has done a lot of good for animals in the past but this plan SUCKS. The Mustang Eco-Resort is a no go in the eyes of the American public and we citizens respectfully ask Mrs. Pickens to go back to the</p>	emc0108

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	drawing board and come up with a plan that STOPS the BLM from unnecessarily removing wild horses from their rightful land versus warehousing the victims of the atrocities and enabling the BLM to continue their destruction of our national icons, the wild horses and burros of the west.	
287.	At what cost will SAM be compensated and how will this formula be determined?	emc0110
288.	Does the Proposed Plan and the process to implement the Proposed Plan comply with Elko County's Land Use Plan?	emc0110
289.	The Association does not stand for one use over another on public lands. We believe in the multiple use concept of management and question whether this plan abides by that concept as set forth by the BLM.	emc0110
290.	The Association commends the Bureau of Land Management for seeking other tools to provide the American public with an understanding and more awareness of issues pertaining to wild horses. Although we support this goal, we strongly feel this plan does not support multiple uses of public lands, contribute to the economy in a measurable value, or support the goal of maintaining healthy rangelands for the enjoyment of the American public.	emc0110
291.	The Mustang Monument LONG TERM HOLDING FACILITY is a bad idea for Nevada, and for the wild horses that now roam the open range. Please do not allow this horrible operation to proceed under these unacceptable conditions! Thank you for your consideration.	emc0111
292.	The public is already paying the government to supposedly manage viable and reproducing family bands in these HMAs. It really defeats the purpose of managing a viable herd when we are being asked to pay for fencing, roundup, castration of stallions and putting more horses in short-term holding facilities and then subsidizing Ms. Pickens to care for the castrated horses who will now inhabit the HMA's. Therefore, I object to any proposal to further reduce the number of wild horses or acreage available to them who supposedly are protected under federal law.	emc0112
293.	The public is already paying the government to manage viable and reproducing family bands in HMA "sanctuaries" on their legally designated land. Now this plan is asking the public to pay for fencing, a roundup, castration of stallions, more horses in short-term holding and then...so much per head to Pickens to care for the geldings who will now inhabit the HMA's.	emc0114
294.	The BLM was quoted as saying Pickens herself agreed to the above plans with all its potential deadly and unlawful consequences. And when questioned, Pickens representative at the meeting said her (meaning Pickens) hands were tied. She has no choice except to accept the removal plan the BLM is forwarding. Is this not blackmail?	emc0114
295.	Both the A WHPC and ASPCA support Saving America's Mustangs' (SAM's) goals for the creation of an "eco-sanctuary" in northeastern Nevada. These goals include: <ul style="list-style-type: none"> • Returning horses currently held in BLM short-term holding facilities to a natural habitat environment; • Using the large public grazing allotment for the benefit of horses; 	fxc0001

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Comment No.	Comment	Cmt Ltr Code
	<ul style="list-style-type: none"> • Creating an eco-sanctuary that highlights the importance of wild horses to American history and culture. 	
296.	<p>As a result, to satisfy BLM's Wild Horse Act and other legal obligations, A WHPC and ASPCA urge that all eco-sanctuary proposals with a public land component, including the one currently pending before the agency, be evaluated according to the following criteria:</p> <ul style="list-style-type: none"> o The proposed ecosanctuary will not result in a loss of habitat (HMA acreage) for non-captive wild horse or burro populations; o Will not reduce Appropriate Management Levels ("AMLs") for non-captive wild horses and burro populations; • Will not convert wild free-roaming populations or portions of populations to non-reproducing herds, as this would violate the BLM's mandate under the Wild Horse Act and its regulations and would undermine the explicit purpose of wild horse preservation. 	fxc0001
297.	<p>The BLM lacks the scientific information on which to base a decision to convert a wild free-roaming population of wild horses to an entirely or partially non-reproducing herd. This is evidenced by the fact that the agency has turned to the NAS to provide answers to necessary questions. Therefore, the BLM does not have the scientific data or information it needs to prepare an EIS on any proposal that includes this aspect at this time, and should at least wait until the NAS has completed its work before proceeding with such an action.</p>	fxc0001
298.	<p>I. Maintain geldings, transferred from holding facilities, on the Spruce Allotment in place of cattle, while continuing to maintain wild free-roaming populations in the HMAs at present levels through an effectively-administered PZP fertility control program.</p> <p>Since the geldings are non-reproductive, there should be no need to fully fence the Spruce Allotment. Geldings may also be less migratory than intact stallions, so may tend to remain on the allotment in the absence of fencing. [4]</p> <p>This alternative would achieve SAM's goals of providing an sanctuary for horses otherwise in holding facilities without harming wild populations that will continue to roam on these HMAs. As a result, it should be included as the preferred alternative in any EIS, because it is the alternative that best protects wild horses while allowing the proposed ecosanctuary to proceed for the great benefit of the many gelded horses that will otherwise continue to be kept in holding facilities. It should be an environmentally preferable alternative to the proposal detailed in the Scoping Brief, since it best accounts for the natural resources of the area, including the unique and majestic wild horses required to be protected by the Wild Horse Act.</p> <p>Failure to consider this alternative would be contrary to the Wild Horse Act, because it would seek to implement a proposal that would not be at the "minimal feasible level" of wild horse management as explicitly required by the Act. 16 U.S.C. § 1333(a). Rather than implementing the proposed ecosanctuary that would result in a substantial removal of wild horses from these HMAs and an overall net loss in wild horses, the alternative proposed in these comments would allow</p>	fxc0001

**Table C-3
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Comment No.	Comment	Cmt Ltr Code
	the agency to undertake its "minimal feasible level" of management mandate for these wild horse populations while simultaneously creating the proposed ecosanctuary for the benefit of some already non-reproducing horses kept in long-term holding facilities.	
299.	<p>2. Maintain geldings from holding on the sanctuary's private lands, while using the Spruce Grazing Allotment AUMs for the benefit of the wild horse population, averting removals during the next roundup cycle, thereby reducing the numbers of horses sent to holding.</p> <p>This alternative would achieve the sanctuary's goals by both 1) improving the plight of horses currently held in BLM short-term facilities; and 2) preventing more horses from being brought into holding facilities.</p> <p>Under this alternative, the sanctuary's private lands could be used to house captured wild horses who would be relocated from BLM short-term holding facilities, while the Animal Unit Months (AUMs) currently allotted to cattle on the Spruce Allotment would be transferred to wild horses, thus allowing larger numbers of wild horses in the three HMAs that intersect with the allotment to remain on the range. This would avert the need for removals during the next roundup cycle, thus preventing horses from entering the holding system in the first place and saving taxpayers money. SAM could be compensated for reallocation of AUMs in the Spruce Allotment to wild horses, under a scenario that would save taxpayers money by averting future roundups and removals.</p> <p>This alternative would have to be accompanied by an effective fertility control program utilizing PZP so that wild horse numbers did not exceed the new AML established after transfer of the Spruce Allotment AUMs from cattle to wild horses. This could be achieved through a partnership between BLM and SAM, similar to the partnerships between BLM and non-profits that helping BLM to manage wild herds in the McCullough Peaks and Sand Wash Basin HMAs on the range with minimal removals utilizing remotely-delivered PZP vaccines.</p> <p>This alternative would likely require a legislative change to allow BLM to compensate SAM for use of AUMs. This legislative change can be achieved during the two year EIS-process. Thus, this should not be grounds for dismissing this alternative.</p> <p>By supporting one of the alternatives outlined above, the BLM will decrease the number of horses in ShortTerm Holding (STH), permit SAM's plan to have an ecosanctuary for wild horses which provides public access and education, and support a proposal which results in a net benefit for wild horses, for captive-held nonreproductive horses, and for American taxpayers.</p> <p>It should be noted that this alternative best fulfills the concept of an ecosanctuary, because it would incorporate visitor opportunities to view mustangs out in the HMA, living in the way nature intended in a manner that preserved their natural behaviors.</p>	fxc0001

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300.	In outlining the various options to be presented in the Draft EIS, we believe that it is essential to clarify how the changes envisioned in this proposal and "restructuring" these HMAs will accomplish outcomes of achieving AML. The Draft EIS also needs to specifically identify the legislative and regulatory authority that would govern the proposed project. In addition, BLM needs to set forth what steps it intends to take in order to comply with these regulatory requirements. Without this information, neither BLM nor the public can accurately assess the feasibility of the proposed project.	emc0083
301.	Having reviewed the maps at the recent round of public scoping meetings, we also believe the Draft EIS needs to clearly enunciate the manner in which any wild horses still remaining in the "restructured" area HMAs will be precluded from entering the proposed project area or how the "non-reproductive" herd of wild horses within the proposed eco-sanctuary will be kept inside the proposed eco-sanctuary.	emc0083
302.	Any preferred alternative to establish the eco-sanctuary for a non-reproducing herd of wild horses inside the boundaries of the outlined area, should also include (1) a provision for total removal of all of the wild horses on the three existing HMAs and (2) deletion of those HMAs status as HMAs. This consideration is mentioned on page 2, which offers the two bullets of required amendments to the Wells Resource Management Plan, but we believe it is essential that such an action be clearly spelled out as part of the preferred alternative and interwoven into a strategy which connects the consequences of establishing an eco-sanctuary with zeroing out the three existing HMAs and assurance that horses within the eco-sanctuary will not be authorized to roam outside of the proposed project area.	emc0083
303.	The Draft EIS also should elaborate on the approach to be used to alleviate the potential of the project not being successful and how corrections will be made for consequences of either rangelands or wild horses encountering deterioration. If closure of rangelands are required how with these circumstances be dealt with?	emc0083
304.	"Removing and Retiring Portions of the Spruce Grazing Allotment from NI Grazing District" In development and publishing of the Draft EIS for the Proposed Northeast Nevada Wild Horse Eco-Sanctuary, we maintain that appropriate documentation be provided as part of the Draft EIS, which details the legislative and regulatory authorization used to complete this action as well as the legal process followed in carrying out the amendment for the Wells Resource Management Plan which results in "removing and retiring the portion of the Spruce Grazing Allotment east of U.S. Highway 93 from the NI grazing district. ". The process of removing and retiring a grazing allotment is complex and any proposal must clearly spell out how the proposal will comply with existing regulatory mandates.	emc0083
305.	The draft EIS needs a more complete description of how and where wild horse management would take place in regard to distribution within the project area.	emc0083
306.	Within the context of using federally managed lands for establishment of the Proposed Northeast Nevada Wild Horse Eco-Sanctuary, there seems to be an intended perception that wild horse populations will be managed in a more effective	emc0083

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	<p>manner with cost savings as one of the beneficial outcomes. We are unclear from the sketchy outline of the proposed action whether this dual objective (improved management for less costs) will be possible or even intended. In the Draft EIS we expect to be provided a full costs-benefits analysis provided with the detailed background and assumptions included.</p> <p>We further maintain that these base findings be used in the on-going management process and adjustments to management and remuneration be linked to the established economic considerations presented in the final EIS. Simply using meaningless application of economic data which has no consequences in eventual decision making or on-going implementation is not acceptable. Perhaps when numbers used for planning purposes have resulting implications for actual performance we may anticipate improved quality in realistic numbers of costs and benefits used in the analysis?</p>	
307.	<p>The Proposed Northeast Nevada Wild Horse Eco-Sanctuary suggest that multiple use, to some degree, will still be provided, but scant detail is offered on how or what limitations will be required in order for the management and containment of the wild horses within the project area can effectively occur. Details pertaining to multiple use opportunities need to be detailed in the Draft EIS.</p>	emc0083
308.	<p>Because of the combination of the various elements of lands, resources and wild horses we contend that the details provided in the Draft EIS need greater specific description and requirements. In addition to the monitoring and essential reporting of findings for rangeland standards, we believe that the additional element of wild horse monitoring and reporting also needs to be detailed in the EIS analysis and findings.</p> <p>Regular accounting (probably on an annual basis) should be evaluated and publicly reported to indicate changes in wild horse population numbers and condition. Adjustments necessary for meeting rangeland objectives should also be provided in an annual report for the Proposed Northeast Nevada Wild Horse Eco-Sanctuary.</p> <p>This reporting, because of the use of federally-managed lands, should be prepared by those agency employees assigned to carry out the monitoring process and published for public information by the Bureau of Land Management. As part of the comprehensive monitoring and reporting portion that is detailed in the EIS process, we believe wildlife and other resources should be covered to give an overview of how these resources will be considered in the applied management of the federally managed lands and multiple use within the project's boundaries.</p> <p>Complete and actual costs associated with the project need to be presented within this annual report with comparison to the baseline economic expectations that are included in the Record of Decision. Necessary adjustments for future alignment in achieving objectives should also be included in the annual report of performance.</p>	emc0083
309.	<p>Given the substantial over population of wild horses within the current HMAs it would be appropriate to demonstrate through range evaluations of the current conditions and how use areas correspond to the boundaries and landscape of the Proposed Northeast Nevada Wild Horse EcoSanctuary.</p>	emc0083

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Comment No.	Comment	Cmt Ltr Code
310.	<p>Based on the very scant details offered by the proposed documentation to explain the Proposed Northeast Nevada Wild Horse Eco-Sanctuary, we have high expectations for greater details to be provided in the Draft EIS, with an emphasis on the legislative and regulatory authority used as the basis for evaluation of the proposal.</p> <p>At present, it is our observation that there is little justification entailed in this proposal for either bringing about more effective management of wild horses or economic stewardship of taxpayer resources. The Draft EIS for the Proposed Northeast Nevada Wild Horse Eco-Sanctuary has a great uphill climb in offering substantiation which would cause that perspective to change.</p>	emc0083
311.	<p>Included in the assessment process for public comment should be a cost estimate if the agency is required to enter into litigation.</p>	emc0115
312.	<p>I would suggest an alternative to maintain the potential economic growth to the Wells area and maintain the educational potential of this proposal.</p> <ol style="list-style-type: none"> 1. The private land portion of the proposed area be fenced. This area could house BLM horses in any capacity required. Horses could be held as an overload intake, short-term or long-term as needed under private contract. 2. "SAM's" privately held cattle AUM's be "converted" for use for wild horses. This would increase the AML of the Spruce allotment, yet would not change the resource use equation. 3. Increased AML in the Spruce would allow the "eco-resort" to conduct educational and recreational tours of the HMA to observe wild horses managed as intended by law. 4. The "eco-resort" could continue outreach projects in conjunction with BLM on range studies, herd counts, migration, etc. <p>This alternative would offer the region the proposed economic growth, enable a educational and tourism opportunities and increase BLM's capacity to house animals that are in transit or in need of holding.</p>	emc0083
313.	<p>Site the eco-resort / eco-sanctuary on the 14,000 acres of private lands known as the Warm Creek Ranch. Only the private acreage -- the 14,000 acres -- would be fenced to contain the resort area and the sanctuary for the non-reproducing horses. All HMA lands would stay as they are currently configured. Antelope Valley, Goshute, and Spruce-Pequop HMAs would remain fully intact and designated for reproducing, self-sustaining wild-horse herds.</p> <p>Authority for this approach: Sec. 4 of the Wild and Free Roaming Horses and Burros Act of 1971, which states, in part: Nothing in this section shall be construed to prohibit a private landowner from maintaining wild freeroaming horses or burros on his private lands, or lands leased from the Government, if he does so in a manner that protects them from harassment, and if the animals were not willfully removed or enticed from the public lands. Any individuals who maintain such wild free-roaming horses and burros on their private lands or lands leased from the Government shall notify the</p>	emc0116

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	<p>appropriate agent of the Secretary and supply him with a reasonable approximation of the number of animals so maintained.</p> <p>Wild-Horse World</p> <p>Of the 14,000 acres of privately-owned land, the eco-resort would take up 500 acres, while the ecosanctuary would occupy the remaining 13,500 acres, where the non-reproducing horses would live in as close to "in-the-wild" conditions as possible. With Holistic Management in practice, the eco-sanctuary could accommodate 500 horses. The approximately 500,000 acres of grazing rights in the overlapping HMAs would be dedicated for the use of true wild horse herds. As the "Gateway to the HMAs," the eco-resort would ...</p> <ol style="list-style-type: none"> 1. Manage the Antelope Valley, Goshute, and Spruce-Pequop HMAs on behalf of BLM using state-of-the-art, state-of-the-science management models. 2. Administer these HMAs principally, though not exclusively, for the benefit of wild horses, as the Act intended. <p>The eco-resort's management approach would follow these principles:</p> <ol style="list-style-type: none"> 1. HMA boundaries would be corrected to restore the wild horses' seasonal and migratory routes. 2. HMA boundaries would not be fenced. The wild horses would keep their access to water sources, seasonal ranges, and migration passages. 3. Wild-horse herds would grow to optimal size to ensure genetic viability and self-sustaining capacity. 4. The HMAs' respective stocking rates would be equal to those of cattle plus the wild horses' current AMLs. 5. Cougars, wolves, and bears would serve as the wild-horse herds' primary population-control agents. 6. Bait and water trapping would be the exclusive gather method used, if needed. <p>Here are the features of this management model:</p> <ol style="list-style-type: none"> 1. Guide-led excursions into the HMAs to observe and photograph wild-horse families -- especially the babies -- would be the highlight of the resort's attractions, winning support for the Wild Horse and Burro Program. 2. Enlightened and ecologically-sound management of public lands would be showcased. 3. Access to those public lands would remain open, with expanded recreational opportunities. 4. Predators would be re-introduced, re-established to achieve a true natural and ecological balance. 5. Livestock AUMs would be converted to additional wild-horse AUMs, enabling the herds to be of genetically-viable size. 6. Greater sage-grouse habitat would be expanded to help keep the species from being listed. 7. Native wildlife—elk, mule deer, and other species—would be conserved and their habitat, protected. 8. Archaeological sites would be inventoried, protected, and honored. Historical mining-district sites would be preserved. 9. Wilderness study areas (WSAs) would be respected, and quiet, responsible recreation would be conducted in such areas. 	

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Comment No.	Comment	Cmt Ltr Code
	<p>As a wild-horse eco-sanctuary, the eco-resort would offer ...</p> <ol style="list-style-type: none"> 1. A refuge for 500 wild horses while enabling neighboring HMAs to convert to wild-horse ranges, 2. An open, accessible site for wild-horse advocates to follow up on horses removed from the range, 3. Wild-horse gentling and training amphitheater -- where guests could observe the process, 4. Petting and treat-feeding station -- always neat to say you fed a mustang a carrot, 5. Adoption center -- with pre-gentled and trained mounts available to take home or ship home. <p>As an ecologically-oriented and educational resort, it would offer ...</p> <ol style="list-style-type: none"> 1. Educational center with theater; Nature and conservation classes 2. Outfitters to lead excursions into the HMAs to view wild horse families 3. Archaeological preservation projects, and educational seminars 4. Tours of Native American historical sites, such as pronghorn traps 5. Link-up with cultural events at Goshute Native American Reservation 6. Tours to Historic Mining sites 7. Sage-grouse preservation projects, with opportunities to contribute sweat equity 8. Wildlife viewing and photography outings, with emphasis on species of concern 9. Bird watching: sage grouse, Hawk Watch, other raptors, other avian species 10. Arboretum and botanical garden; hydroponics to produce the resort's vegetables 11. Hiking trails to special scenic spots 12. Bicycle treks 13. Tour, trail, and trek departure-and-return station for all of these activities <p>As a western-hospitality-themed and equine-oriented resort, it would offer ...</p> <ol style="list-style-type: none"> 1. Camping area 2. Natural horsemanship classes 3. Horseback riding lessons 4. Pony rides for the little ones 5. Horseback trail rides into the HMAs, with picnics provided 6. Trail rides: Half-day, whole day, sunset, kids-only, etc. 7. Stables for those who want to bring their own horses 8. Hayrides, wagon rides, stagecoach rides 9. Western music and dancing activities 10. Mechanical bull-riding 	

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Comment No.	Comment	Cmt Ltr Code
	<ul style="list-style-type: none"> 11. Learn-to-use-a-lasso lessons 12. Barbeques 13. Small-scale, open-air passenger train to travel the perimeter of the resort 14. Souvenir shop 15. Western-clothing shop 16. Western boots shop <p>As a vacation destination, the eco-resort would have world-class amenities:</p> <ul style="list-style-type: none"> 1. Soaring lobby with fireplace and library 2. Conference center, fully-appointed, state-of-the-art 3. Golf course, 18-hole, Championship; golf clinics 4. Tennis courts; tennis clinics 5. Indoor swimming pool (to prevent evaporative loss) 6. Restaurants 7. Fitness center and spa; massage center 8. Yoga and Tai Chi classes 9. Art classes 10. Cooking classes -- Culinary Academy 11. Climbing wall 12. Wedding chapel 13. Gaming opportunities (this is Nevada, after all) 14. Jobs for residents of the local communities and the Goshute Indian Reservation 	
314.	Madeleine Pickens purchasing land and purposing a wild horse Eco-Sanctuary here in Nevada is quite possibly the best thing that's happened to the State of Nevada in recent years.	rmc0007
315.	<p>You can be sure I'll be one of the first to visit the Eco-Sanctuary -- I'm all for wild horses and feel they should be allowed to roam free. I will also advocate that people make the trip to visit as well.</p> <p>The BLM' s approval of the Eco-Sanctuary will be my first time ever in saying "thank you". Over these last years the BLM has not been on my "favorites" list but perhaps this will help change my opinion and perhaps the BLM' s as well.</p>	rmc0007
316.	<p>In summary I offer the following reasons for the wild horse EcoSanctuary to move forward:</p> <ul style="list-style-type: none"> (1) Madeline Pickens knows about horses (2) she knows about money (3) she knows how to manage 	rmc0007

Table C-3
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Comment No.	Comment	Cmt Ltr Code
	<p>(4) she knows about entertainment (5) she knows about people (6) the Eco-Sanctuary will be another listing in the Nevada AAA Tourbook (6) the Eco-Sanctuary will prove to be a win-win for the wild horses, BLM and "we the people" (7) the surrounding areas will benefit with the Eco-Sanctuary (8) it's a win-win for the BLM as well, less round-ups(?) and a place for horses to roam free (9) I will promote visiting Nevada, its wild horse Eco-Sanctuary and surrounding areas in the State</p>	
317.	<p>As BLM moves forward with the development of the EIS, we respectfully request that the agency work closely with the local people who know and understand the affected lands, behavior of the horses and wildlife in the area, and the history of the area. This would include the Nevada Department of Wildlife, County Natural Resource staff, and local ranchers. The EIS should be focused on what is truly the best for the land and all affected animals. Local knowledge and experience must be considered a valued source for purposes of making your analysis. We also anticipate that BLM, in seeking workable solutions for the management of wild horses, will move forward cognizant of the federal statute surrounding the protection of livestock grazing preference.</p>	rmc0009
318.	<p>6. Economics are a legitimate element of an EIS. BLM should address options the government has for determining how a reasonable and fair payment would be determined for paying Saving America's Mustangs (SAM) for managing the sanctuary (e.g. fencing cost options; SAM personnel costs, such as manager's expense shared with the private ranching operation and the sanctuary; other operating and management costs; who pays for removing unwanted introduced horses and gathering escaped horses; and other issues). In other words, the public has the right to know the options for determining the annual cost of the sanctuary. 7. Personnel and other expenses may be considered fixed costs in addressing a response to a Request For Proposal. However, in the name of transparency, these costs should be shown as information relative to "savings" that may be suggested by the SAM proposal. 8. BLM should conduct a cost savings analysis including fence building/upkeep, cost of conducting an EIS for the possible changes to the involved HMAs, administration and coordination of the agreement, cost of gathering all horses within the allotment and replacing them or gelding/spaying them, potential cost of lawsuits to prevent zeroing out the current HMAs, and related issues.</p>	rmc0009
319.	<p>9. BLM should evaluate an alternative of SAM applying for a special use permit to conduct the tours and provide outreach with BLM continuing to manage the horses.</p>	rmc0009
320.	<p>10. BLM should identify the guidelines for information, education, and outreach. BLM must ensure accurate information is distributed through any organization that may be involved in this type of partnership. We request a review of current</p>	rmc0009

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	information being distributed by this or other entities that are submitting proposals to evaluate their ability to provide accurate information.	
321.	II. BLM should detail the repercussions or consequences should SAM fail to provide any of the deliverables of the agreement including keeping horses within the sanctuary or providing inaccurate information about the program, BLM, other land uses, etc.	rmc0009

Table C-4.A
Comments Related to Wild Horse Management – General

Comment No.	Comment	Cmt Ltr Code
1.	Whereas livestock allotments and other uses may be converted to provide critical habitat that is necessary and imperative to the survival of special status species consisting of Free Roaming Wild horse and Burro Herds, the converse is not applicable (by operation of law) and (again) the conversion of public lands to any use that diminishes those protections, are prohibited.	emc0003
2.	BLM and USFS are exceeding their jurisdiction to manage wild equis herds off their native ranges. However the herd area may be expanded/extended to provide critical habitat.	emc0003
3.	While there is public support of converting cattle AUMs to horse AUMs, please provide me with BLM's authority to gauge wild horse herds as a special status wildlife species with the same aml or aum measurement for RMP purposes. Is this consistent with the gauge for other wildlife? Isn't it true that the equis herds still constitute less than one percent of public land grazers?	emc0003
4.	The horses must be managed as wild animals, and not moved from pasture to pasture.	emc0006
5.	I think the public's wild horses have been over managed for several years in favor of special interest. The cattle that are on public lands have degraded as much public land if not more than the horses have.	emc0013
6.	By law, mustangs should remain on the range and wild and free. Gelding stallions and maintaining a penned in area of geldings does not preserve the mustangs; it actually condemns them.	emc0014
7.	Over the past 40 years, the BLM has systematically zeroed out 111 HMAs and stolen over 24 million acres of rangelands that were, as mandated by Congress, to be devoted "PRINCIPALLY" to wild horses and burros, thereby reducing their federally-designated habitat by around 40% -- nearly half, and counting -- since the passage of the Wild Free-Roaming Horses and Burros Act of 1971. Enough is enough! This shameless land grab must end! There should be NO MORE ZEROING OUT of wild equine herds from their lawfully designated range for, once gone, these treasured herds are not allowed to return.	emc0020
8.	Moreover, a recent analysis of geneticist Gus Cothran's work for BLM from 2000 to 2011, revealed that only 53 herds out of 182, were identified as requiring low allowable numbers above 100 and, in fact, having numbers above 100. Cothran himself states you must maintain a minimum of 100 breeding adults. In other words there are only 53 healthy herds of wild horses left. Of the nearly 70% of the HMAs that still remain, BLM's has set AML levels so perilously low as to not ensure genetic viability and to guarantee extinction.	emc0020
9.	Wild horse areas that have been illegally stolen must be restored and AMLs must be significantly increased to ensure genetic viability while at the same time livestock in wild horse areas must be eliminated or GREATLY reduced in order to allocate a FAIR SHARE of public lands and resources to our wild herds. Extraction industries must also not be given preference over wild horses whose lawfully designated areas are to be managed PRINCIPALLY for THEIR use. This	emc0020

Table C-4.A
Comments Related to Wild Horse Management – General

Comment No.	Comment	Cmt Ltr Code
	would be a good start in giving back to the wild horses what is rightfully THEIRS by law.	
10.	<p>For the benefit and future survival of OUR wild herds on OUR public lands -- specifically the Spruce Pequop, Goshute and Antelope Valley HMAs -- there must be:</p> <p>NO ZEROING OUT OF FEDERALLY DESIGNATED HMAs FOR WILD EQUINES NO REPLACING WILD INTACT VIABLE HERDS WITH NON-PRODUCING STERILIZED HERDS NO GELDING/SPAYING OR PERMANENT CHEMICAL STERILIZATION OF WILD EQUINES NO LOWERING OF AMLS BEYOND GENETIC VIABILITY FOR WILD EQUINES NO REDUCING OF LIFE-SAVING FORAGE AND WATER FOR WILD EQUINES BY FENCING NO REDUCING OF ACREAGE RESULTING IN RANGE LOSS FOR WILD EQUINES</p> <p>With so few wild horses and burros left in the wild, any further loss of populations through eradication by the BLM would flagrantly undermine the Congressional mandate of wild equine preservation.</p> <p>It is time for the BLM to end its war on wild equines and start entertaining the idea of actually PROTECTING this national heritage species as you have been mandated to do by Congress or else you run the risk of violating your mandate and the regulations of Wild Free-Roaming Horses and Burros Act of 1971.</p>	emc0020
11.	Someday, I wish to have the awesome experience of viewing OUR wild equines on OUR public lands but by wiping out the wild horses and burros from the west, the BLM is eliminating one of the multiple uses of viewing and enjoyment of wild horses by the public, including our children. Future generations will not thank you for being complicit in the annihilation of these living legacies whose beauty we all have a right to experience.	emc0020
12.	At the rate the west is being swept clean of our nation's mustangs, we will soon lose the trace wild herds who still manage to survive, if this onslaught does not stop now! I urge the agency to proceed with caution before planning yet another assault on America's fast disappearing wild horses. Your decision could well determine whether or not our nation's last remaining mustangs will have a future.	emc0020
13.	Mustangs should run free, they are a symbol of America and deserve to be treated with honor.	emc0028
14.	Developers leave wide gaps between properties where horses can get from the hillsides to the housing developments and streets. The horses camp out looking for grass and water. Developers need to take responsibility and close off behind the developments. Horses are no longer safe. A sanctuary is needed to keep our horses safe.	cfc0006
15.	For perspective, it's critical to consider how unfair & low the national HIGH AML of 26,600 WH&B really is, which includes only about 3K burros. Since roundups/removals are targeting LOW AML, then the national total AML would only be around 18K WH&B left on the range, with the LOW AML for burros to be about 2K. This is a subversion of the original intent of the 1971 Act & threatens the very survivability of all the herds long-term, including the wild burros. This	emc0021

Table C-4.A
Comments Related to Wild Horse Management – General

Comment No.	Comment	Cmt Ltr Code
	is the number that was estimated to be on the range in 1971 when the Act was passed to protect them.	
16.	Up to 3M livestock graze 157M acres of BLM lands. Up to 1.5M livestock graze another 81M acres of USFS lands. Millions of game wildlife (elk, mule deer, pronghorns & bighorns) are free to roam 650M total Federal land acres, which includes BLM/USFS lands, plus State & private lands. The WH&B are now restricted to a paltry 27M BLM acres & 2M USFS acres, that livestock also use. To add insult to injury, the WH&B are only allocated 5-18% of the forage on their restricted lands with the majority allocation going to livestock. Also note, 70K bighorns are considered a 'species of concern' by the wildlife community, so 18-26,600 WH&B total nationally is just NOT acceptable.	emc0021
17.	Additionally, as well as America's WH&B being restricted to a miniscule amount of Federal lands compared to livestock & other wildlife, they are also restricted within their HMAs by livestock fencing & cross-fencing. How on earth can they be "free-roaming" with these barriers which prevent them from access to adequate forage and water to "sustain a healthy population" across all seasons of the year? Note, a "healthy population" is way more than the horses just having good body weight and being disease free. It means:	emc0021
18.	The social/behavioral structure of the family bands is maintained so the critical band education system, the knowledge pool, is handed down from the older generation band members to the younger generation, - Genetic viability & diversity is maintained for long-term sustainability with herds of 150 or more animals each, - Natural selection is maintained so only the strongest, healthiest animals in their family bands carry on their exceptional genes to the next generation, - Full reproductive capability is maintained throughout the wild reproductive herds in natural male/female ratios of 50:50, - Migratory grazing behaviors are maintained by full access to summer & winter ranges via historic migratory routes, - Natural wild behavior is maintained with as little human intervention as possible, - The herds are non-traumatized by helicopter roundups, massive removals & manmade selective random releases back to the range with no regard for family social structures, - No geldings or sterilized mares are mixed in with reproducing herds	emc0021
19.	You at the BLM remain bound by your oath to uphold the laws pertaining to the lands and beasts you govern. The wild horse are protected by American law, and this is America still, is it not? You MUST protect them, and leave them roaming free, as the law DEMANDS, so I demand. To do otherwise is an act of treason, not to mention crime.	emc0022
20.	In addition to identification of pastures or use areas, emergency contingency measures should identify what measures will be taken should any situation, such as wildfire, or lack of forage cause them to be relocated.	emc0018
21.	Wild horses already only occupy half the land they had in 1971.	emc0002

Table C-4.A
Comments Related to Wild Horse Management – General

Comment No.	Comment	Cmt Ltr Code
22.	The legal requirement to cull overpopulation (PL 92-195 as amended, Sec. 3b. 2. (c)) is systematically ignored by the agency. The wildlife result is that feral horses are subject to starvation, weakness, illness and disease due to overgrazed range and deteriorated springs, among other effects of overpopulation. The agency views the result as positive in that additional animals require additional financial and personnel resources for program administration.	emc0030
23.	Conclusion Fundamentally, cattle raising is economically productive and vibrant. The proposed fencing in and sterilizing of feral horses will render them sorrowfully listless. The proposal requires productive citizens to forfeit a portion of or their entire livelihood in order allow SAM to concentrate and sterilize the feral horses, thereby committing a heinous atrocity all in the name of SAM's misdirected eco-tistical guilt. The BLM will support this annual negative economic impact because the agency sees a virtual transfer of additional funds to their control. In reality, the eco-sanctuary proposal is societal loss of food production with the end result of sterile, captive formerly feral show-horses. As an absolute minimum, SAM must pay the annual \$556,000 to \$1,800,000 to Elko County and the ranchers who have been and will continue to be harmed by SAM's taking of that amount of economic productivity.	emc0030
24.	Therefore, any ecosanctuary proposals must be evaluated according to the following criteria to ensure that they: Will not reduce Appropriate Management Levels (AMLs) for non-captive wild horses and burro populations;	fla0000 baseltr1
25.	Therefore, any ecosanctuary proposals must be evaluated according to the following criteria to ensure that they: Will not reduce Appropriate Management Levels (AMLs) for non-captive wild horses and burro populations;	fla0000 baseltr2
26.	Therefore, any ecosanctuary proposals must be evaluated according to the following criteria to ensure that they: Will not reduce Appropriate Management Levels (AMLs) for non-captive wild horses and burro populations;	fla0000 baseltr3
27.	In contrast, this proposed sanctuary would convert the Spruce Allotment into a very expensive tax funded hospice for unwanted horses that would produce nothing more than manure. The main underlying circumstance that lead the Sorensen family to sell their Spruce allotment was the damage to the ranges being caused by ever present and increasing numbers of wild horses. The uncontrolled numbers of horses on the allotment, year round, were literally putting them out of business. We have faced, and continue to face, the same discouraging challenges on our allotment.	rmc0005
28.	The scoping document did not confirm that this herd will be managed as a nonreproducing herd, although we have heard that it may only be composed of gelded stallions. This should be confirmed and then describe in what way will the eco-sanctuary horses be marked for identification. Identification will be crucial to detection of any invading reproductive viable horses. The EIS should incorporate a plan with clearly defined criteria of how invading horses will be surveyed, and removed.	emc0018

Table C-4.A
Comments Related to Wild Horse Management – General

Comment No.	Comment	Cmt Ltr Code
29.	These horses are legally supposed to be free-roaming & not be harassed that's in the 1971 law, which is supposed to be still in effect.	emc0018
30.	As a geologist, it is quite evident that the "wild" horses free-roaming the public lands today are feral animals. There is abundant and sound scientific documentation in the fields of paleontology, archaeology, biology, geology, and historical documentation, that equids that evolved in the Great Basin and elsewhere on the North American Continent became extinct some 10,000 years ago. This was mostly due to an abrupt natural and cyclical climate change resulting in vegetation and water resource alterations during the Pleistocene (ice age) to Holocene (present time) transition. These natural celestial cadences of climate change over the past two million years or so are the natural glacial "ice ages" and interglacial arid periods, such as the present interglacial we are living in today in the Great Basin. "Wild" free-roaming horses in the Great Basin today are feral, exotic, escaped or released domesticated animals first re-introduced during European incursion into the area beginning in the 16th Century by Spanish conquistadors and settlers. But predominantly the feral horses in the Great Basin today are newcomers who escaped or were released during the past 150 years of Euro-American exploration and emigration into the region as demonstrated by genetic testing. These feral horses did not evolve under the present arid to semiarid sagebrush steppe ecosystem climate conditions predominating over the West during the past 11,000 years. I suggest that everyone, especially feral horse advocates, read, absorb, and contemplate the balanced perspective presented in Donald K. Grayson's 1993 book, <i>The Desert's Past-A Natural Prehistory of the Great Basin</i> . This book presents a more realistic perspective based on decades of sound scientific observation instead of the often biased and irrational, emotional and uncompromising, and often untruthful rhetoric shamelessly or ignorantly, and dare I say propaganda, put out in feral horse advocate web sites.	emc0034
31.	It is foolish, wasteful, and heedless to maintain the present free-roaming feral horse and burro populations. It is out of hand and bordering on a state of insanity based on the expectation of different results while continuing to follow the present legislative mandates of management	emc0034
32.	I therefore make the following suggestions and recommendations concerning the proposed feral horse sanctuary: Indigenous wildlife such as pronghorn, mule deer, elk, birds, and other species well-being should have the highest priority in the management of any proposed feral horse sanctuary utilizing public lands.	emc0034
33.	As a conservationist with a realist perspective, I think it best for the deteriorating Great Basin ecosystems that all feral horses should be removed from the public lands as today they are not indigenous species.	emc0034
34.	1) Each Nevada BLM district office should evaluate potential for one feral horse sanctuary within their areas public land responsibility. Basic criteria should be a herd management areas that can truly sustain a reasonable number of feral horses without damaging the natural environment, inhibit indigenous wildlife, contain reliable water sources, and not interfere with the paid for privilege of grazing rights of ranching families.	emc0034

Table C-4.A
Comments Related to Wild Horse Management – General

Comment No.	Comment	Cmt Ltr Code
35.	The wild horses and burros, as the legal tenants of the herd management areas, by necessity need to be left in the areas where the Wild Free Roaming Horse and Burro Act has established them as the principal species. By necessity they need to be left untouched and unaltered by mankind's intervention, left to nature's capable hands, and not regulated by the BLM's concept termed, "the appropriate management level". Nature knows very well how to establish the appropriate numbers of wild horses and burros within an area, as well as all other interactive species of animals, without human intervention. By virtue of these well established scientific principles, there is no need to establish an eco-sanctuary, and no need for any more roundups.	emc0038
36.	leave the wild horses alone on their lands and remove the welfare cattle/sheep & mining interests.	emc0063
37.	No to Madeline Pickens proposal... her publicly financed proposal will ruin three adjacent mustang sanctuaries cutting off food and water and resulting in all the wild horses on those sanctuaries having to be rounded up. Pickens can do what she wants on her land but it is not ok to wipe out three mustang sanctuaries in the process. PLEASE PROTECT OUR WILD HORSES!	emc0065
38.	The wild horses and burros, as the legal tenants of the herd management areas, by necessity need to be left in the areas where the Wild Free Roaming Horse and Burro Act has established them as the principal species. By necessity they need to be left untouched and unaltered by mankind's Intervention, left to nature's capable hands, and not regulated by the BLM's concept termed, "the appropriate management level". Nature knows very well how to establish the appropriate numbers of wild horses and burros within an area, as well as all other interactive species of animals, without human intervention. By virtue of these well established scientific principles, there is no need to establish an eco-sanctuary, and no need for any more roundups.	fxc0002
39.	I have found it has been the continual assertion by the Bureau of Land Management that it is striving to maintain a thriving natural ecological balance In reference to the wild horse and burros and that this is its constant goal in managing them. The BLM maintain that the ranges can only support what it calls an appropriate management level of wild horses in reference to the herd management areas as a whole, and based upon this number, has justified its aggressive roundups to take in what it calls excess wild horses and burros, due to what it terms, overpopulation. The BLM's alternative to the roundups, in this particular area, is an eco-sanctuary made up of a non producing number of wild horses, restricted within a fenced area, and zeroing out the those areas of the HMAs, not contained within these boundaries. I would like to address this alternative point by point, purely from a scientific standpoint.	fxc0005
40.	The wild horses and burros, as the legal tenants of the herd management areas, by necessity need to be left in the areas where the Wild Free Roaming Horse and Burro Act has established them as the principal species. By necessity they need to be left untouched and unaltered by mankind's Intervention, left to nature's capable hands, and not regulated by the BLM's concept termed, "the appropriate management level". Nature knows very well how to establish the appropriate	fxc0005

Table C-4.A
Comments Related to Wild Horse Management – General

Comment No.	Comment	Cmt Ltr Code
	numbers of wild horses and burros within an area, as well as all other interactive species of animals, without human intervention. By virtue of these well established scientific principles, there is no need to establish an eco-sanctuary, and no need for any more roundups.	
41.	Throughout the west it is clear that wild horses cannot be managed to any reasonable level and it will be no different if this range is converted to a so called eco sanctuary for wild horses.	emc0076
42.	If this proposal was allowed to go forward it will not help the overall wild horse problem and will be a temporary fix.	emc0076
43.	If people want to see wild horses they can do so without having to go to a sanctuary. The sanctuary, as proposed, is being used to promote wild horses rather than to control wild horses thereby working to cause more damage to the public rangelands all at the expense of the american public. Considering that all the so called wild horses on the public rangelands in Nevada are really "feral" horses and to treat them otherwise would be supporting a lie. Wild horses must be controlled as directed by the Wild horse and burro act and the sooner the better. There is nothing that has caused more damage to the public rangelands then the excess wild horse population and all at the expense of the public.	emc0076
44.	Since 1971, wild horses have been zeroed out from 111 herd areas representing over 20 million acres; this represents nearly half of the habitat originally designated for wild horses and burros under the Wild Free-Roaming Horses and Burros Act.. In 70% of the remaining herd management areas, BLM's population targets are set at levels that will not ensure genetic viability. Given these numbers, any proposals for eco-sanctuaries or holding facilities that result in a net loss to existing populations explicitly undermine the goals of wild horse preservation and the Wild Free Roaming Horses and Burros Act. There can be NO reduction in Appropriate Management Levels for non-captive WH&B populations.	fxc0004
45.	<p>The Goals that must be achieved in this or in any plan are:</p> <p>Viable Herd population levels: This number is well known by the BLM and accepted by the scientific community as the minimum number of horses that must be available to continua a genetically healthy herd. According to the foremost equine geneticist, Dr. Gus Cothran, 150-200 adult horses are needed In a herd [Intermingling] to ensure their genetic diversity.</p> <p>The basic philosophy and premise of SAM must be structured in such a way as to respect the Integrity of the Free Roaming Wild Horses and Burros Act AND the will of the American People.</p> <p>The law states the intent of Congress and the will of the American people that our wild horses be managed on the range In a humane and minimally intrusive manner that preserves their wild and free-roaming behavior.</p>	fxc0004
46.	There are far too many wild horses. They should be destroyed and/or fed to the poor.	fxc0006
47.	On another note alfalfa is the worst hay for these wild horses, as they will be subject to colic and founder issues, and I can only hope that somewhere at the BLM level they have a nutritionist in the mix to oversee. lvd heard you have	emc0058

Table C-4.A
Comments Related to Wild Horse Management – General

Comment No.	Comment	Cmt Ltr Code
	Veterinarians onboard to oversee feeding situations, although I feel unless they have a specialization in nutrition they are not the best people to oversee the feed operations.	
48.	Wild horses/burros in the wild cost the taxpayer zero and PUBLIC LAW 92-195 say that's where they are supposed to be!	fla0013
49.	The numbers of horses you deem appropriate for certain areas only seems "appropriate" if you're goal is to eventually die away with these magnificent animals. The numbers you are leaving in the wild is unacceptable. Surely you all know that, yet you continue with the horrific round ups, fracturing bands, injuring horses...why? So you can spend money keeping them in short and long term holding facilities so that cattle, owned by private ranchers, will have the room to graze. How about spending all the millions of dollars you do in removing the mustangs on maintaining them in the wild?	fla0056
50.	I support wild horses and burros on those rangelands designated for them based on a fairer allocation of resources on public lands. I support implementation of in-the-wild management, which would keep wild horses and burros on the range and save taxpayers millions of dollars annually by avoiding the removal and stockpiling of wild horses in government holding facilities.	fla0077
51.	No eco-sanctuary plan that includes an existing, legally designated HMA should reduce the appropriate management level (AML) for that wild horse or burro population.	emc0040
52.	A severe loss in habitat would not allow for as many wild horses to roam freely within their HMA boundaries and would thus result in a removal and/or adjustment of the AMLs of these herds. It should be noted that Dr. Gus Cothran maintains that a herd should have a population of at least 150-200 adults in order to avoid a significant loss of genetic diversity. Only the Antelope Valley Herd AML (155-259) meets this standard and then only barely falls within the minimum standards. These herds cannot afford a reduction in AML if they are to be "self-sustaining," per the Wild Horse and Burro Act.	emc0040
53.	I question the use of the term 'healthy' wild horse population. I understand that the opposite (i.e. and 'unhealthy' population) is inappropriate. However, there should be a recognition that there will be unhealthy animals within the populations. Specially examples are a 15 year old stud with one ear and blind, the aging mare with broken teeth that will not make it through the next winter, the yearling with limited mobility due to a deformed leg from a natural accident, the injured stallion that escaped a predator but lives a survival existence. Criteria for treatment needs to be discussed in the proposal for care/treatment of such 'unhealthy' animals. For some animals the sanctuary will resemble what I see when I visit my 96 year old mother in her hospice. The discussions of the Pryor Mountain Wild Horse Committee meetings I attended in 1969-1970 suggested minimums of comfort and avoidance of pain as the fundamental criteria. This may or may not be the answer, but the subjects of disease, injury and physical impairment need to be covered	emc0073

Table C-4.A
Comments Related to Wild Horse Management – General

Comment No.	Comment	Cmt Ltr Code
54.	How will the permittee separate her horses from BLM if they mix?	emc0082
55.	The rancher ships his stock to market, what happens to dead horses?	emc0082
56.	While we agree that wild horses and burros are part of our western heritage and have a specific place on our federal lands, we must remember: these animals have the potential to reproduce at a rate of 20% per year and have no natural predators. Converting livestock allotments to HMAs or increasing AMLs is not the solution and would, in fact, exacerbate the problem. Since enactment of the H&B Act in 1971, livestock grazing on federal lands has been reduced by as much as 50%, while the horse population has risen 44%. The result has been damage to local stakeholders, rural economies, the natural resources, and ultimately the horses' well-being. Creating sanctuaries will not solve the problem if the reproduction rate of the overall population is not reduced.	emc0084
57.	8. Fires: As is much of our public rangelands, the Spruce Allotment is subject to catastrophic wildfires through the cheatgrass-wildfire cycle. Past poor management and future increased grazing by sanctuary horses will increase the already widespread cheatgrass and the threat of wildfires on the Spruce Allotment. Where will the sanctuary horses be moved or how will they be fed if allotment forage is lost in wildfires?	emc0087
58.	Horses (<i>Equus caballus</i>) are not indigenous to sagebrush steppe in the Great Basin (see Nonindigenous Horses and Burros: Statement of Facts, attached). The Bureau of Land Management must analyze this proposal in light of the fact that horses are an exotic species in sagebrush habitat.	emc0088
59.	5) Needed is to address the public observation component of the horses. It "appears" Madeleine's and the BLM's idea of an eco-sanctuary is wild horses that the public can see who don't exhibit the behavior of wild horses or Mustangs in the wild. I and others of the public have a different idea of an eco-sanctuary. It is a place where the public can see the true behavior of the Mustangs with stallions, mares, and foals, and with family bands and bachelor bands exhibiting protecting, challenging, producing, nurturing, leading, teaching, and learning behavior. Madeleine in her recent letter to the public referred to the "eco-sanctuary" as an "eco-resort." Is it her intention to build a resort on her private land that caters to the wealthy, yet the everyday taxpayer has to pay for the fences and management of the horses. As previously stated, the public should see this proposal in its entirety.	emc0089
60.	10) Madeleine wants to save horses from the corrals. Given BLM's new calculations, with a 1 to 1.8 ratio, 900 cow AUMs will convert to 500 horse AUMs on Madeleine's allotment. At high AML 464 Mustangs are in Spruce Pequop, Goshute, and Antelope Valley. Madeleine will take in 500 gelded, male, horses. In exchange, she will send to corrals 464+ Mustangs, mares, foals and stallions. Where is the SAVING? She says the horses that are removed will have a place at the MONUMENT. Mares and foals are not accepted. REMEMBER?	emc0089

Table C-4.A
Comments Related to Wild Horse Management – General

Comment No.	Comment	Cmt Ltr Code
61.	<p>I would like to close with a personal experience regarding wild horse use of public lands in Nevada. I do not have a degree in range management from a classroom. My time on the range is short compared to other ranchers. However, I have seen enough indisputable horse damage to be concerned, even scared, for the real resource in question; the range. The area of range I reference is in Millick Canyon. Historically, the canyon was used by sheep with some limited horse herds present. Since 1976, the sheep have been sold and the horse population has continued to increase. Cattle, with their inability to range too from water, are incapable of reaching this canyon. For more than 30 years the horses have had exclusive use of this area. Where there were once vibrant white sage flats, there are now solid halogeten monocultures. The horses never gave the range a chance to rest. Unlike the other multiple users which follow a time on/time off rotation. This heavy impact has had an irreversible impact on the resource. Without rotation, grass was devoured, then the less appealing but still serviceable plants. Finally, the invasive species take over and the result is what we see in Millick Canyon today.</p> <p>The horses have left the canyon and have sought out new range. The range the horses have found historically has only seen seasonal livestock use. Due to the presence of horses, allowed utilization is now reached before livestock are even present. Only time will tell if they are allowed to kill this range off also. In summary, an eco-sanctuary in the arid Great Basin High Desert is not a sustainable answer to a problem so complex.</p>	emc0090
62.	Therefore, any ecosanctuary proposals must be evaluated according to the following criteria to ensure that they: Will not reduce Appropriate Management Levels (AMLs) for non-captive wild horses and burro populations;	flc0000
63.	Although I supported the original intent, the Eco-Sanctuary Plan - as forwarded by the BLM - is not now, and can never be acceptable. For in it horses are subject to loss of water, loss of life and reproducing families, loss of habitat and the disappearance of HMA's which are already existing tax payer supported sanctuaries. This plan would set one of the most disastrous precedents for the future of wild horses since the protective law was put into place in 1971, and is about as far from First, do no harm and the 1971 Wild and Free-Roaming Horse and Burro Act as you can get.	flc0002
64.	Elko County does not believe that the wild / feral horse would be sustained in a healthy and beneficial manner for the wild / feral horse or wildlife and the proposed eco-system will not sustain the wildlife and numbers of wild / feral horses proposed.	rmc0003
65.	This proposal does nothing to address the bigger problem of dealing with the ever growing numbers of wild horses in the western United States. It only proposes to provide a very expensive, political short term fix to an ever growing problem.	rmc0005
66.	The perceived attitude of wild horse advocates is that every foal born on open Western ranges should be protected and cared for until they die of old age. The reality that the wild horse population doubles in size every 5 or 6 years makes this desire impractical and unsustainable. We treat few other animal species on earth with this approach.	rmc0005

Table C-4.A
Comments Related to Wild Horse Management – General

Comment No.	Comment	Cmt Ltr Code
67.	Our wild horses are an integral part of the environment in which they live. Without that specific environment, they are nothing more than farm animals. A wild horse herd from one region transplanted to another region and put behind fences is no longer the wild horse herd it was. It is no longer a product of its historical environment.	emc0097
68.	In 1971 there were 303 wild horse and burro herds recognized with approximately 60,000 animals counted in the first census done by the BLM in 1974. The law specifically stated that "these horses and burros are fast disappearing from the American scene," yet we have fewer animals now than existed when the Act passed. To be exact, we have lost 124 of those areas where wild horses and burros no longer roam and the population of animals has been drastically reduced to half their numbers since the Act passed. How can this happen when Congress recognized these animals as "symbols of the historic and pioneer spirit of the West; that they contribute to the diversity of life forms within the Nation and enrich the lives of the American people?"	emc0101
69.	The wild horses were originally left by the homesteader of your country.... They have a right to be there.... They are wild... Leave them be..nature takes care of itself...	emc0103
70.	Since 1971, wild horses have been zeroed out from herd areas representing over 20 million acres; this represents nearly half of the habitat originally designated for wild horses and burros under the Wild Free-Roaming Horses and Burros Act ("Wild Horse Act"). In 70% of the remaining herd management areas, BLM's population targets are set below 150 horses, the level necessary to safeguard genetic viability according to E. Gus Cothran, Ph.D., geneticist with the Texas A&M University and consultant to the BLM.2 Given these numbers, any proposals for ecosanctuaries or holding facilities that result in a net loss to existing populations explicitly undermines the goals of wild horse preservation and the mandates of the Wild Horse Act	fxc0001
71.	In particular, ASPCA, A WHPC and its coalition members do not find it objectionable under the Wild Horse Act to create a sanctuary where horses otherwise residing in long-term holding facilities can live and roam. Indeed, the Wild Horse Act specifically contemplates such a sanctuary- "[n]othing in [the Act] shall be construed to prohibit a private landowner from maintaining wild free-roaming horses or burros on his private lands, or lands leased from the Government, if he does so in a manner that protects them from harassment, and if the animals were not willfully removed or enticed from the public lands." 16 U.S.C. § 1334.	fxc0001
72.	Particularly in light of declarations from leading wild horse biologists (see Attachments 1-4), the BLM must analyze the legality, under the Wild Horse Act and its implementing regulations, of any proposal to convert existing AMLs of wild, reproductive horses with to non-reproductive horses. Moreover, also in light of those declarations and other evidence, if the BLM considers any alternative that allows non-reproductive horses at the sanctuary to reduce, at all, current levels of wild, reproductive horses in the three HMAs, the agency must consider the full range of environmental effects on wild horse behavior, biology, physiology, and genetic viability of wild horse populations in the existing HMAs.	fxc0001

Table C-4.A
Comments Related to Wild Horse Management – General

Comment No.	Comment	Cmt Ltr Code
73.	<p>The potential for extensive impact to the management structure of wild horses throughout the west exists based on the outcome of this "eco-sanctuary" management conversation occurring in the Elko district.</p> <p>Although the scope of this proposal is great, the issues are simple. This proposal condenses the current issues faced within the area of range management and long-term holding. These areas of the program are both currently riddled with crisis. This proposal solves none of the problems and has the potential to compound the crisis, not take a single step toward resolving any issue.</p>	emc0115

Table C-4.B
Comments Related to Wild Horse Capture and Long-term Holding

Comment No.	Comment	Cmt Ltr Code
1.	With government holding facilities bursting at the seams with upwards of 50,000 captive mustangs already, it seems foolhardy for this agency to continue its unsustainable business as usual cycle of roundup-remove-warehouse, with no end in sight. This is a policy to nowhere and it must stop. Not only is it fiscally irresponsible, with the taxpayers having to foot the bill for this nonsense, but the BLM is on a fast track to managing our nation's last remaining wild equines into extinction. This failed strategy cannot and MUST NOT continue, especially when there are humane and cost-effective alternatives to this madness.	emc0020
2.	Alternative to culling, the horses are gathered for holding in stockyard conditions where no semblance of being wild remains. Coincidentally, the proposed eco-sanctuaries would do much the same, in terms of both fencing and sterilization of the animals in order to render the herds non-reproducing.	emc0030
3.	The agency advertises adoption programs, but those are substantially under-subscribed. Consequently, the majority of gathered animals are concentrated at holding facilities.	emc0030
4.	As it is now proposed, the "eco-sanctuary" ranch plus adjacent zeroed out HMAs will function as nothing more than a long term holding facility. The only difference will be that Madeleine will be able to allow the public to view the animals although it is clear, no one will be interested in that!	emc0041
5.	It is wrong to keep the wild mustangs and burros in BLM holding facilities.	fla0001
6.	These animals must be released from your holding pens & given a sanctuary where they can roam free without the threat of be sold to auction for Horse Slaughter!	fla0050
7.	Originally, I was under the impression that this eco-sanctuary would take actual herds of wild horses - not geldings. But I guess at this point anything is better than leaving any of these horses in short or long term holding.	fla0079
8.	Why would the BLM have any objection to a sanctuary is beyond belief. There are too many in holding pens now and this is an opportunity to release these poor, cruelly treated horses	fla0109
9.	The BLM has not been able to maintain horse levels at or below their established AML throughout their herds. In fact levels of two to three times the appropriate numbers are common. The proposed preserve does nothing to facilitate control of horse populations on the public lands. Once the carrying capacity of the preserve was reached, even making the unlikely assumption that there was no breeding, there would be no further potential for the placement of excess animals removed from other herds.	emc0068
10.	g. Since the horses will remain with the permittee until "death do us part", will BLM limit its willingness to pay (through annual fees charged by the permittee) extraordinary medical costs ala Terri Schiavo or should the permittee make that decision?	emc0082

Table C-4.B
Comments Related to Wild Horse Capture and Long-term Holding

Comment No.	Comment	Cmt Ltr Code
11.	Also the majority of removals are done by helicopter. Helicopter gathers are dangerous, often deadly, things. I recently read how the 2009 Challis HMA in Idaho killed seven horses and orphaned several foals. Even Bait trapping is dangerous. During the 2006 bait trap gather of the Pryor Mountains of Montana, a fowl was killed by a mountain lion, likely lured by the large congregation of horses at the trap.	rmc0001
12.	Question: Considering the well demonstrated inability to gather all the horses that are on virtually any allotment and the fact that there are several hundred "Wild and free roaming" horses already on the Spruce allotment, how can and will the horse population on the proposed sanctuary be managed, controlled, and be made nonproducing to ensure the health and vigor of the range resource itself?	rmc0005
13.	I am resentful of my federal government when we spend our collective tax dollars farming horses instead of managing them in the wild. Expensively gathering more horses from the wild and putting them in Short Term Holding while moving a similar number of horses from Short Term Holding to non-producing herds into the same but expensively remodeled area makes no logistical or financial sense. It's just moving Short Term Holding to northern Nevada.	emc0097
14.	Having a more nature-based area to which currently held Short Term Horses are transferred for Long Term Holding is definitely an improvement over the current Short Term Holding situation. However, this can never be viewed as a possibility if it involves removing more functioning wild horses from public lands.	emc0097
15.	As we are all aware by now, roundups can and do kill horses. Stallions die protecting their families and from castration surgery, foals die by being left behind or trampled and mares die from injuries or stress related colic.	emc0114
16.	Then round-ups and holding pens make me sick. I'm one that believes these horses were here long before the BLM came to be and they should be free to roam.	rmc0007
17.	3. BLM should evaluate the timeframe and methodology (water trapping, feed trapping, estrus trapping, helicopter herding) for removing stallions from the sanctuary as well as from adjoining Herd Management Areas (HMAs) that may be retired and returned to Herd Area (HA) status.	rmc0009

Table C-4.C
Comments Related to Wild Horse Reproduction and Family Units

Comment No.	Comment	Cmt Ltr Code
1.	All of Spruce Pequop, 2/3 of Goshute and better than half of Antelope (part that is on the table) will become non-reproducing herds, AND all of "Mustang Monument" (SAM) area.... i.e., 100% mares removed and all the stallions gelded...all non-reproducing herds!	emc0002
2.	Establishment of a non-reproducing females and geldings, on land that is legally designated for wild free roaming horse/burro HERDs, conflicts with the original intention and mandate of the FRWHBA. This again is outside of BLM's management jurisdiction.	emc0003
3.	How will the behavior of a gelding herd be different than that of wild horses with a relatively intact band structure?	emc0006
4.	I am completely and totally opposed to establishing a wild horse herd of geldings (or one of mares for that matter) on land that is legally designated to truly wild horses, whose family structure and ability to reproduce and maintain genetic herd viability is the very purpose of the Wild Free Roaming Horses & Burros Act. To circumvent this in anyway and under any circumstances should NOT be allowed! Ms. Pickens proposed ecosanctuary with gelded horses in no way will allow the true nature of the Mustangs as wild, free roaming herds.	emc0007
5.	To displace vital, reproducing herds on their legal areas with sexually neutered, semi-domesticated horses, as the ecosanctuary proposes, is in defiance of the horses' natural place in the West.	emc0007
6.	I only just read about the proposal for an eco-sanctuary for wild horses; this sounds like a great idea, but why would three existing herds need to be destroyed by removing the mates and gelding the stallions? What kind of "wild" families would they be able to start? These herds have existed for a very long time and rather than destroying everything that gets in our way, couldn't we actually help preserve something? These horses live in family units and we don't have the right to destroy that. Please don't do this.	emc0009
7.	The plan you are considering in Nevada to sterilize 3 wild herds for the sake of an ecosanctuary is not what we want for these herds, and not what we want used as a model for managing our wild herds	emc0010
8.	10) What happens in 20-30 years when all of the non-reproducing horses in this eco-sanctuary die? By that time, given the lack of genetic viability in so many herds, and BLM's continued and accelerated removals, there will be no wild horses left to replace them. What are the future plans for the public lands that were within the HMAs?	emc0011
9.	The plan that you are considering in Nevada of sterilizing 3 wild herds for the sake of an eco-sanctuary is not good for these herds. This is not what I think should be used as a model for managing our wild herds.	emc0012
10.	The BLM says there are too many wild horses on the preserves to sustain them and all the other native creatures, want's to herd them up with helicopters, pen them up in a desert with no shade and no water and no vet care, "auction" them to the highest kill-buyer bid and wave goodbye. Who may I ask is paying for the gelding? Ms Pickens?	emc0016

Table C-4.C
Comments Related to Wild Horse Reproduction and Family Units

Comment No.	Comment	Cmt Ltr Code
11.	this project releases FAKE wild horses--as they are castrated animals--and therefore are not "wild" any more. There will not be breeding stallions or mares--therefore the herds are a LIE to the American public--and AGAIN, you are sentencing the truly wild horses to prison and extinction.	emc0017
12.	You can't preserve a species by keeping only non-reproducing individuals alive. Of course, the BLM knows that, but, so do we. Those horses do not belong to the BLM. They belong to the taxpayers like me, and we prefer them alive and reproducing on the land that was designated for them by Congress.	emc0019
13.	I also oppose any conversion of these three wild herds into sterile, non-reproducing herds for the sake of this eco-sanctuary.	emc0023
14.	According to the Scoping Project Brief, the agency aspires to manage the Spruce Pequop Herd Management Area (HMA) as an entirely non-reproducing (DEAD END) herd by replacing wild freeroaming stallions -- who are protected under federal law -- with castrated geldings. BLM is also seeking to make it a requirement that SAM entirely fence off the 500,000-acre Spruce Allotment, which, as BLM is well aware, which would reduce the acreage and allowable management level (AML) of the wild horses in the Goshute and Antelope Valley HMAs. As if this scenario is not bad enough, the agency is implying that in exchange for Ms. Pickens being bestowed the great privilege of being allowed to set up her "ecosanctuary", BLM is proposing to remove all of the mares from the Spruce Allotment, geld all the stallions, and also seeks to remove the mares and gelding the stallions in the surrounding Antelope and Goshute HMAs as well. This is nothing more than a recipe for extermination!	emc0020
15.	If permanent sterilization were to take place, gone would be the natural behaviors associated with wild free-roaming horse herds - the special bonds between family members whether they be stallion and mare, mare and foal, siblings or interactions with other families. Bachelors bands trying to acquire mares or foals playing with each other. Freedom and family are absolutely essential for the well-being of a wild equines. Without the ability to perform the role as protector of his family along with the social interactions that are so critical to wild horse behavior, gelded stallions have no purpose and become shells of their former selves. All of this natural social behavior normally found in the wild would be lost if stallions were castrated and returned to the range and fenced into what amounts to nothing more than the type of sterilized zoo Secretary Salazar had in mind for our federally protected wild herds. This would set a deadly precedent for the sterilization and zeroing out of our nation's last remaining wild equine herds not only in Nevada but all over the west where the few vestiges of wild herds still manage to survive.	emc0020
16.	I think SAM should be able to put up the sanctuary. But I don't approve of gelding all the boys, if you make them all gelding - they won't be wild anyone they will be like pets. I think it is a great way of keeping them from over-populating and to keep them wild. I'm a horse lover and I only wish the best for the horses.	cfc0002

Table C-4.C
Comments Related to Wild Horse Reproduction and Family Units

Comment No.	Comment	Cmt Ltr Code
17.	I think that we should give Madeleine a shot a the sanctuary. I do not think we should geld all the males because it stops them from being wild. A lot of animals lives have a natural part of their life, if we take that away, it changes there behavior. We want to have what we see and what we study. In order words, what we discover. We don't want to destroy what they are and how they live.	cfc0003
18.	Absolutely no HMAs can house nonreproducing herds. That is completely counter to the original intent of the 1971 Act and 43 Code of Federal Regulations, §4700.0-6(a), which states in part, that wild horses and burros "shall be managed as selfsustaining populations of healthy animals in balance with other uses . . ." This is yet another ploy to zero out existing HMAs, which is also not supported by the 1971 Act.	emc0021
19.	Gelded mustangs are useless mustangs. We need the stallions and the mares in order to keep the species going.	emc0027
20.	Removing ALL wild horses and sterilizing them from 3 HMA's for the sake of this eco-sanctuary IS NOT what taxpayers want for these herds.	emc0001
21.	Therefore, any ecosanctuary proposals must be evaluated according to the following criteria to ensure that they: Will not convert wild free-roaming populations or portions of populations to non-reproducing herds, as this would violate both the BLM's mandate under the Act and its regulations.	fla0000 baseltr1
22.	I also oppose the conversion of viable, free-roaming wild horse populations to non-reproducing herds in any Herd Management Areas (HMAs).	fla0000 baseltr2
23.	Therefore, any ecosanctuary proposals must be evaluated according to the following criteria to ensure that they: Will not convert wild free-roaming populations or portions of populations to non-reproducing herds, as this would violate both the BLM's mandate under the Act and its regulations.	fla0000 baseltr2
24.	I also oppose the conversion of viable, free-roaming wild horse populations to non-reproducing herds in any Herd Management Areas (HMAs).	fla0000 baseltr3
25.	Therefore, any ecosanctuary proposals must be evaluated according to the following criteria to ensure that they: Will not convert wild free-roaming populations or portions of populations to non-reproducing herds, as this would violate both the BLM's mandate under the Act and its regulations.	fla0000 baseltr3
26.	The scoping document did not confirm that this herd will be managed as a nonreproducing herd, although we have heard that it may only be composed of gelded stallions. This should be confirmed and then describe in what way will the eco-sanctuary horses be marked for identification. Identification will be crucial to detection of any invading reproductive viable horses. The EIS should incorporate a plan with clearly defined criteria of how invading horses will be surveyed, and removed.	emc0018
27.	Yes the public IS smart enough to realize that a herd of geldings is NOT a wild horse herd.	emc0018

Table C-4.C
Comments Related to Wild Horse Reproduction and Family Units

Comment No.	Comment	Cmt Ltr Code
28.	If these feral horse sanctuaries are located within reasonably sustainable areas of water sources and forage, they do not need to be all fertilization controlled animals. Periodic management controls could remove selected stallions and mares to be transferred between the various sanctuary herds to ensure genetic diversity, herd health, and propagation.	emc0034
29.	Breeding could also be controlled and periodic gathers conducted to satisfy an ongoing feral horse adoption program.	emc0034
30.	The concept of a thriving natural ecological balance, within any ecosystem, and implied in the very term, "eco-sanctuary" relates to the fact that the system is self sustaining. This means it has the ability to freely reproduce, with no restrictions, other than those instituted by nature itself. Density dependent and inhibition come into play here as other species of animals interact with the wild horses and burros, along with predators and environmental conditions to maintain the appropriate levels of each individual species of animal with in that system.	emc0038
31.	It is also clear that the conditions of the eco-sanctuary, established by the BLM, are set up such that the wild horse and burros would not be self sustaining and able to reproduce and would quickly die off.	emc0038
32.	I'm confused about the non-productive statement. Are are all of Nevada's wild herds going to be rounded up and sterilized? How will this effect the genetics of the herds?	emc0047
33.	This proposal has morphed into the worse possible scenario for wild horses in the West. It is completely unconscionable that BLM would propose to remove all the horses from the existing 3 HMAs that abutt Madeleine's ranch and then allow her to put only geldings out on her land and on the surrounding public lands.	emc0041
34.	But apparently BLM is not wise enough to realize NO ONE is going to come and visit sterile gelding bands and be thrilled. I know this fact has been shared with you in the past - I myself wrote to Sec Salazar when he asked for input on his program review and I know many others have made this point as well. People are not going to pay to see gelding bands!	emc0041
35.	This is to let you know that I strongly oppose the creation of the Eco-sanctuary in Northeast Nevada in its current form. I oppose the following among other things including the: Gelding stallions Breaking up family structures whereby mares are separated from stallions Removing all mares from certain HMAs	fxc0003
36.	1) The concept of a thriving natural ecological balance, within any ecosystem, and implied in the very term, "eco-sanctuary" relates to the fact that the system is self sustaining. This means it has the ability to freely reproduce, with no restrictions, other than those instituted by nature itself. Density dependent and inhibition come into play here as other species of animals interact with the wild horses and burros, along with predators and environmental conditions to	fxc0002

Table C-4.C
Comments Related to Wild Horse Reproduction and Family Units

Comment No.	Comment	Cmt Ltr Code
	maintain the appropriate levels of each individual species of animal with in that system.	
37.	(4) This brings a 4th aspect of this concept of an eco-sanctuary to our attention. As a thriving natural ecological balance is absolutely necessary to any ecosystem, including an eco-sanctuary, it is by necessity that a hands-off approach is required. The moment there is any attempt to alter an ecosystem in an artificial manner, assumes that this dynamic personality operating within an ecosystem or eco-sanctuary is going to behave as we determine it should. In essence, from that point on, it ceases to be natural and thriving, because those vital components, contained in the system, whether microbial, or otherwise are being altered, and the system begins to break down. This hands-off approach implies no manmade restrictions on the area, including fencing and any determent to the ability of the wild horse and burros to reproduce as nature would have it.	fxc0002
38.	It is also clear that the conditions of the eco-sanctuary, established by the BLM, are set up such that the wild horse and burros would not be self sustaining and able to reproduce and would quickly die off.	fxc0002
39.	(1) The concept of a thriving natural ecological balance, within any ecosystem, and implied in the very term, "eco-sanctuary" relates to the fact that the system is self sustaining. This means it has the ability to freely reproduce, with no restrictions, other than those instituted by nature itself. Density dependent and inhibition come into play here as other species of animals interact with the wild horses and burros, along with predators and environmental conditions to maintain the appropriate levels of each individual species of animal with in that system.	fxc0005
40.	(4) This brings a 4th aspect of this concept of an eco-sanctuary to our attention. As a thriving natural ecological balance is absolutely necessary to any ecosystem, including an eco-sanctuary, it is by necessity that a hands-off approach is required. The moment there is any attempt to alter an ecosystem in an artificial manner, assumes that this dynamic personality operating within an ecosystem or eco-sanctuary is going to behave as we determine it should. In essence, from that point on, it ceases to be natural and thriving, because those vital components, contained in the system, whether microbial, or otherwise are being altered, and the system begins to break down. This hands-off approach implies no manmade restrictions on the area, including fencing and any determent to the ability of the wild horse and burros to reproduce as nature would have it.	fxc0005
41.	It is also clear that the conditions of the eco-sanctuary, established by the BLM, are set up such that the wild horse and burros would not be self sustaining and able to reproduce and would quickly die off.	fxc0005
42.	Methods proposed of keeping them from being fertile is contrary to the intent of the wild horse and burro act and certainly isn't what was precieved as being "wild and free roaming".	emc0076
43.	There can be NO conversions of Wild Free Roaming Reproducing Herds or PORTIONS of Herd populations to Non-reproduing Herds. This would be in violation of the mandates of the Free Roaming Wild Horses and Burros Act and	fxc0004

Table C-4.C
Comments Related to Wild Horse Reproduction and Family Units

Comment No.	Comment	Cmt Ltr Code
	in violation of BLM's regulations under the Act.	
44.	BLM's plan in Nevada of sterilizing 3 wild herds for the sake of Picken's eco-sanctuary or any sanctuary is not what we want for these herds. Additionally it is not what we want used as a model for managing our wild herds. Sterilizing these herds is illegal and will zero out wild horses.	fxc0007
45.	I also feel their families should not be separated at roundups but kept together and if they must be moved, they be moved together as a family and then brought to Eco sanctuaries and moved in a humane way while having the public involved overseeing the process.	emc0058
46.	My specific concern has to do with the non-reproducing aspect of the proposal. It would be tragic to have only one-sex animals on the ground...e.g. all geldings, or all PCPtreated mares. Horses are very social animals, exist in a band structure, and deserve to have some semblance of that to help them orient their lives.	emc0059
47.	I even wonder if orphaned foals could be accommodated in such a setting, adding more social interaction.	emc0059
48.	I would like to know that there are advantages of having a protected non-breeding population in place of a nomadic breeding population.	emc0062
49.	I object to any attempt by the BLM to use an "ecosanctuary" as an excuse for reducing the number of wild horses who are protected under federal law and/or the acreage available to them, or their replacing the Wild Free Roaming Herds with Gelded, non-producing herds, as this is not what constitutes a Wild Free Roaming Herd in their natural habitat.	fla0040
50.	Returning geldings instead of stallions would be a huge mistake. In doing so, the entire social structure would change not to mention, as I'm sure you realize, releasing stallions as geldings would only ensure an end to the herd...no stallions = no foals. If that is the route you end up going, then you will have made it VERY clear where your priorities are. Unfortunately for the horses, it will be painfully obvious to all, that your priorities are NOT the well being of our American icon...the wild and free mustangs.	fla0056
51.	It is so disappointing and criminal to control the birth of mustangs that are about to be extinct!!! For God's sake, we are no talking about over population of the wild horses, the fact is that they are in great danger!	fla0057
52.	Most importantly, and disturbing, is the real possibility that the BLM's actions will harm the genetic viability of the horses as they may want to make the free-roaming herds totally non-reproducing. The Wild Free-Roaming Horses and Burros Act's mandate was to preserve the species, and that would entail reproductive and genetic diversity, not the systematic and eventual extinction of the wild horses by means of total sterilization.	fla0065
53.	I am in full support of this ecosanctuary but believe it should contain breeding horses in family groups. Otherwise it will be no different than long term holding pastures!!!!!!	fla0068

Table C-4.C
Comments Related to Wild Horse Reproduction and Family Units

Comment No.	Comment	Cmt Ltr Code
54.	Wild horses are not horses in isolation. They are individuals within a social matrix for survival and for insuring their future beyond themselves through reproduction...stallions as producers and protectors, mares as producers too as well as nurturers, leaders, and educators, and foals as learners. To accomplish these tasks in the wild they form bands with a stallion, a few mares, and foals in one kind of band(s), and bachelor stallions in another kind of band(s), waiting to challenge the stallion with the mares. Gelded horses don't have that kind of social matrix. They move in small or large groups with concerns only for their food.	fla0074
55.	Get the cattle off of the wild horses lands and stop neutering horses.	fla0078
56.	Originally, I was under the impression that this eco-sanctuary would take actual herds of wild horses - not geldings. But I guess at this point anything is better than leaving any of these horses in short or long term holding.	fla0079
57.	I do not in any way, shape or form, support the proposed measures of the BLM to allow Madeline Pickens take the mustangs into sanctuary. I wrote earlier supporting her taking them in but I wish to clarify that the herds MUST be taken AND left INTACT! There cannot be any PERMANENT birth control methods such as sterilization. Their numbers are already too low and they face very real dangers from having such a limited gene pool. Stop using every possible excuse to zero out federally protected mustangs and burros!	fla0088
58.	I can not validate this proposal based on a non-producing sanctuary. If you geld all the Mustangs and break up the bands and families you have done nothing but lengthen the time it will take to complete this genocide. I appreciate the desire to re-home those Mustangs in closed pen areas. Unfortunately I don't think they, the Mustangs, would appreciate it if it meant the decimation of their breed by gelding all their stallions and creating a non-producing herd, or by fencing off areas where wild herds still roam limiting their freedom and keeping them from being able to access water that the Geldings, Mares and other horses have plentiful access to.	fla0108
59.	O. I could not agree with this. They must be able to reproduce or. We lose them in the end.	fla0108
60.	Please stop Madeleine Pickins from using public money to fence public lands for her own private HMA project. It is not natural for Mustangs to exist in herds of geldings.	emc0066
61.	<p>The Cloud Foundation does not support the removal of wild, free-roaming horses in order to replace them with non-reproducing (gelded) stallions. Wild horses and burros must be managed sustainably "with the goal of maintaining free-roaming behavior." Anecdotal evidence and testimony by experts like Jay Kirkpatrick, Anne Perkins, and Bruce Nock maintain that geldings do not exhibit the same social organization and social behaviors as stallions. In preparing this EIS, we encourage BLM to consult with experts such as these.</p> <p>The creation of non-reproducing herds on legal HMAs, to create a wild horse "sanctuary"</p>	emc0040

Table C-4.C
Comments Related to Wild Horse Reproduction and Family Units

Comment No.	Comment	Cmt Ltr Code
	<p>violates the letter and intent of the Wild Horse and Burro Act.</p> <p>Bottom line, the release of geldings into the HMAs and calling them "wild" is ludicrous, as they have no purpose in the complex society of wild horses. The wild horse is unique among all hooved animals in our hemisphere. The stallion is the guardian of a band of mares all year round, year after year. I have spent the past 18 years documenting these social behaviors.</p> <p>Geldings would have no "job" in this society. Calling a herd made up largely of geldings a real, wild horse viewing opportunity belittles the intelligence of the public that wish to see real "wild" horses.</p> <p>We assume BLM will brand these geldings before putting them back into the HMAs, an action that will alter their visual appeal. If a tourist attraction is viewing geldings in a field, regardless of the size of the field, one could simply visit a ranch or farm that houses horses. One of the goals of SAM's original proposal was to allow the public to come view and photograph wild horses. This BLM version of SAM's proposal does not meet that goal.</p>	
62.	The EIS should not allow for the removal or adjustment of the wild horses within the legal HMAs in order to implement a non-reproducing herd of geldings. A gelding herd does not constitute a free roaming, self-sustaining, naturally behaving wild horse herd.	emc0040
63.	If all the horses in the ecosanctuary are gelded and mares not able to breed then the wild horses will come to an end. You need to have stallions and mares that are able to produce foal to carry on the genetics of the wild horse! Because wild horses are different from the horses in pasture that have been gelded and since the mares cannot breed the wild horses will be no more. You need to leave enough wild horses in the wild to produce foals and they need to run wild with their bands has they have always done.	emc0075
64.	A note about the proposed numbers of geldings: Does the name "Three Strikes Ranch" mean anything to anyone? Has the applicant proven the ability to properly care for large numbers of wild geldings? As "Fugly Horse of the Day" said in 2010 (about the 3-Strikes Ranch debacle): "I hope the incident will continue to serve as a warning for what can happen when well-meaning people believe they are going to have a sanctuary where mustangs live "as nature intended." Nature doesn't buy hay or pay vet bills, and when you have eighty dead horses between YOUR fences, it is just as prosecutable if they are mustangs or Thoroughbreds. Try having a sanctuary with FIVE horses first, and see if you can handle that for a year...why doesn't anyone ever do that???" - http://fuglyblog.com/2010/01/13/three-strikes-ranch-update/	emc0080
65.	The scoping document indicates that all horses provided by BLM will be neutered. Over time these horses will form a geriatric herd, not a lot of fun for visitors,who expect to see stallions racing around showing their prowess and jewels.	emc0082

Table C-4.C
Comments Related to Wild Horse Reproduction and Family Units

Comment No.	Comment	Cmt Ltr Code
	Since in the wild, many of these horses would die of starvation or predation, how will these aging horses provide a tourist attraction or environmental reality?	
66.	Will the horses be all geldings since BLM seems unable to spay mares? If BLM could spay mares, there would not be so many excess horses.	emc0082
67.	Though I like the idea of converting cattle AUMs to horse AUMs, I am adamantly opposed to establishing a non-reproducing wild horse herd of male geldings (or neutered females) on land that is legally designated for vigorous and reproducing, truly wild and naturally living horses. This breaks the original intention of the WFHBA and should not be allowed! If such "ecosanctuaries" of non-reproducing herds are to be established, they should definitely not be on any of the original legal Herd Areas or subsequently designated Herd Management Areas. Such would only make a mockery of the Act! Then to promote these areas as having "wild horses" for the public to come and view would be a lie, for these would be horses who have had their wild vitality and freedom compromised and they would be dead-end, slave populations.	emc0085
68.	To displace vital, reproducing herds on their legal areas with sexually neutered, semi-domesticated horses, as the ecosanctuary proposes, is neither legally dishonest, and it is at odds with the will of the General Public of the United States of America. It is also in defiance of the horses' natural place in the West, one that is not only justified historically, but also and to a much greater degree by the vast evolutionary history of the horse family, genus and very species -- all of whose origins and long standing evolutionary development are in North America.	emc0085
69.	3. Non-reproducing herds: What does this mean? The Federal Register Notice states "all one sex or sterilized." Will BLM sterilize or neuter all the wild horses in the sanctuary? By what methods? Are the methods humane? Are they effective? How much will this cost and who will pay? If stallions or mares are not sterilized, how will they be kept apart during breeding periods? Or kept away from reproducing animals outside the allotment?	emc0087
70.	Therefore, any ecosanctuary proposals must be evaluated according to the following criteria to ensure that they: Will not convert wild free-roaming populations or portions of populations to non-reproducing herds, as this would violate both the BLM's mandate under the Act and its regulations.	f1c0000
71.	Will not convert wild free-roaming populations or portions of populations to non-reproducing herds, as this would violate both the BLM's mandate under the Act and its regulations.	f1c0000
72.	Removing mares and gelding stallions does not promote free-roaming behavior. A normal herd with its complex society of family bands, including mares, foals, and stallions is free-roaming behavior. It is unnatural for these wild horses to be gelded and then released without their families.	rmc0001
73.	While the herd to be established is to be non-producing, how will this be achieved and maintained?	rmc0002

Table C-4.C
Comments Related to Wild Horse Reproduction and Family Units

Comment No.	Comment	Cmt Ltr Code
74.	Question: Considering the well demonstrated inability to gather all the horses that are on virtually any allotment and the fact that there are several hundred "Wild and free roaming" horses already on the Spruce allotment, how can and will the horse population on the proposed sanctuary be managed, controlled, and be made "nonproducing" to ensure the health and vigor of the range resource itself?	rmc0005
75.	Nowhere is it within the letter or spirit of the Wild and Free-Roaming Horse and Burro Act of 1971 to remove historically present, functioning wild horse herds from public land and replace them with a nonreproducing "herd" of horses gathered from a variety of other locations. Please DO NOT move forward with approving the Mustang Monument if it involves removing or reducing existing functioning wild herds!	emc0097
76.	The point of the sanctuary was to re home wild horses already removed from their habitat. WILD horses. In the wild, they are NOT gelded. And removing surrounding wild horses from their home to enable this place defeats the ENTIRE purpose of the sanctuary.	emc0104
77.	c) It will not be possible to geld/neuter the wild horses without an unacceptable amount of cruelty. Wild, unhandled horses will be terrified by all stages of the process and many will die from the stress.	emc0105
78.	So in order to set up the eco-sanctuary, it would be necessary to remove all of the mares from the Spruce Allotment, gelding all the stallions, and also removing the mares and gelding the stallions in the surrounding Antelope and Goshute HMAs? Nonsensical to anyone that cares about wild horses (and burros) as protected under the Wild Horse and Burro Act. This would mean the complete destruction of three wild horse herds in Nevada. The BLM must not follow this very wrong path. Sterilizing and zeroing out wild horse herds all over Nevada and the west, and replacing them with sterile herds of unrelated horses is not what the legal act states. Show some respect for the law and what Americans want or find something else to do.	emc0106
79.	In the public "scoping" meetings, BLM presented alternatives that didn't really provide much of a choice since all possible "alternatives" offered by BLM included these unacceptable conditions: 1) the roundup and permanent removal of all mares presently on the Spruce allotment within what would become the sanctuary boundary, and the replacing of those mares with geldings from short-term holding even as the newly captured mares are themselves sent to short-term holding. The 1971 law states that wild horses are to be considered an integral ("vital," "fundamental," "essential," "core") part of the natural system of the public lands -- except for mares? This is a Herd Management Area (HMA) we're talking about, where wild horses (and burros if present) are to be given priority as the primary multiple user.	emc0107

Table C-4.C
Comments Related to Wild Horse Reproduction and Family Units

Comment No.	Comment	Cmt Ltr Code
80.	<p>Effectively destroying three HMAs (because each HMA will be seriously interrupted by the perimeter fencing of the sanctuary and the removal of mares), which are home to over 1500 horses, in order to create a sanctuary is contrary to and works against the purpose of the HMAs and the 1971 Act itself.</p> <p>The HMAs are the only places wild horses and burros legally can live. The law clearly states said wild horses and burros are to be considered an "integral" part of the natural system of these public lands and, in keeping with that principle, clearly states "all management activities shall be at the minimal feasible level" so that the wild horses are interfered with as little as possible.</p> <p>With that standard in mind, breaking up families, removing all mares, gelding all stallions, stopping all reproduction, installing fencing which divides and disrupts the natural free-roaming behavior of wild horses on three vast HMAs is the antithesis, the very opposite, of the light-handed management Congress called for when it chose the "minimum feasible" language as the law.</p>	emc0107
81.	<p>What BLM is requiring of SAM (i.e., a nonreproducing population of geldings) can be done on private land but must never be considered in, on, or adjoining an HMA, where Congress clearly intended that these animals should continue to live unfettered in perpetuity with as little human interference as possible. When Congress found that wild horses and burros "enrich the lives of the American people," they were not looking at a herd of geldings. Reiterating, Congress declared its definition of "herd" within the act:</p> <p>Section 1332. Definitions</p> <p>(c) "range" means the amount of land necessary to sustain an existing herd or herds of wild free-roaming horses and burros, which does not exceed their known territorial limits, and which is devoted principally but not necessarily exclusively to their welfare in keeping with the multiple-use management concept for the public lands; (Emphasis added -EG)</p> <p>(d) "herd" means one or more stallions and his mares; ...</p>	emc0107
82.	<p>Sterilization of our wild horses is guaranteeing their eventual extinction... not to mention, the heartwrenching separation and destruction of the herd in it's natural state... with mares and their foals, with stallions standing guard to protect them.. no different from human families.... please, please do not set a precedent for managing our beautiful wild horses, who deserve their lands, deserve their freedom, deserve to be left in peace... by your proposed sterilization program in Nevada!</p>	emc0109
83.	<p>"Eco" suggests natural balance. There is nothing natural OR balanced about sterilized equine herds inhabiting fenced and artificially created habitat.</p>	emc0111
84.	<p>Under this proposed plan, horses are subject to loss of water, habitat and reproducing families and the disappearance of HMA's which are already sanctuaries supported by the public if remained undisturbed. Any proposal to remove existing</p>	emc0112

Table C-4.C
Comments Related to Wild Horse Reproduction and Family Units

Comment No.	Comment	Cmt Ltr Code
	wild horses and make room for already rounded-up horses is a waste of money and not at all at the best interests of the horses being removed. They should be left alone.	
85.	Although I am in favor of the idea of converting cattle AUMs to horse AUMs, I am opposed to establishing a non-reproducing wild horse herd on land that is legally designated for vigorous and reproducing, truly wild and naturally living horses. This breaks the original intention of the WFHBA and cannot be allowed. If such "ecosanctuaries" of non-reproducing herds are to be established, they should definitely not be on any of the original legal Herd Areas or subsequently designated Herd Management Areas. Such sanctuaries should be on private land or if on public land they should not be on the legal areas that were designated for the wild horses and burros. This is entirely contrary to the core intent of the WFHBA.	emc0114
86.	To displace vital, reproducing herds on their legal areas with sexually neutered, semi-domesticated horses, as the eco-sanctuary proposes, is not only legally dishonest, it is at odds with the will of the General Public of the United States of America.	emc0114
87.	Based upon even the most brief examination of the 1971 Act, the plan to remove reproducing families from their existing HMA and replacing them with geldings is not lawful and a complete violation of the law and the spirit of the Congressional Act.	emc0114
88.	<p>Federal regulations (43 CFR § 4700-6) mandate that:</p> <p>(a) Wild horses and burros shall be managed as self-sustaining populations of healthy animals in balance with other uses and the productive capacity of their habitat</p> <p>(c) Management activities affecting wild horses and burros shall be undertaken with the goal of maintaining free-roaming behavior.</p> <p>These mandates cannot be met through conversion of the self-sustaining, free-roaming wild horse population in the Spruce Pequop, Goshute, and/or Antelope Valley HMAs to a non-reproducing herd, or by replacing any wild, free-roaming, reproducing horses that are counted as part of the existing AML with single-sex, nonreproducing, captive horses. The legal and factual reasons why are as follows.</p> <p>1. A non-reproducing herd is not a "self-sustaining population," 43 C.F.R. §§ 4700.0-6, and thus, if applied here at the expense of reproductive wild horse populations would be arbitrary and capricious under the Wild Horse Act and its implementing regulations.</p> <p>2. A sterilized horse is not a wild free-roaming horse and will not retain its wild free-roaming behaviors.</p> <p>The expert declarations from leading wild horse biologists Drs. Allen Rutberg, Dr. Anne Perkins, Dr. Jay Kirkpatrick, and Dr. Bruce Nock (Attachments 1-4) attest to this point in explicit detail. For example, Dr. Kirkpatrick, the Director of Science and Conservation Biology at Zoo Montana and a foremost authority on wildlife reproductive biology, states this</p>	fxc0001

Table C-4.C
Comments Related to Wild Horse Reproduction and Family Units

Comment No.	Comment	Cmt Ltr Code
	<p>point succinctly: "The very essence of the wild horse, that is, what makes it a wild horse, is the social organization and social behaviors. Geldings (castrated male horses) no longer exhibit the natural behaviors of noncastrated stallions. We know this to be true from hundreds of years experience with gelded domestic horses. Furthermore, gelded stallions will not keep their bands together, which is an integral part of a viable herd. These social dynamics were molded by millions of years of evolution, and will be destroyed if the BLM returns castrated horses to the HMAs Castrating horses will effectively remove the biological and physiological controls that prompt these stallions to behave like wild horses. This will negatively impact the place of the horse in the social order of the band and the herd. " (Please see Attachment I for Dr. Kirkpatrick's statement.) The BLM itself has acknowledged the questionable legality of non-reproducing herds. In its own 2008 Implementation Team notes (Attachment 5), the BLM states that managing for non-reproducing herds would require a change in the above regulations, noting "By managing for sterile animals, we may be taking away their 'free-roaming' behavior by altering social interactions." (Emphasis added).</p>	
89.	<p>The Wild Free-Roaming Horses and Burros Act (WFRHBA) requires BLM to manage wild horses and burros in a manner that protects their wild and free-roaming behavior. While Section 3(b)(l) as modified by the Public Rangelands Improvement Act of 1978, does specify options for population management that include sterilization, it states that such determinations must be made in conjunction with other wildlife agencies and experts independent of government, such as those recommended by the National Academy of Sciences (NAS). Indeed, the BLM has requested that the NAS evaluate this question related to sterilizing wild horses: Managing a portion of a population as non-reproducing: What factors should the BLM consider when managing for WH &B herds with a reproducing and non-reproducing population of animals (i.e., a portion of the population is a breeding population and the remainder is non-reproducing males or females)? When implementing non-reproducing populations, which tools should be considered (geldings (castration), sterilized (spayed) mares or vasectomized stallions or other chemical sterilants)? Is there credible evidence to indicate vasectomized stallions in a herd would be effective in decreasing annual population growth rates, or are there other methods the BLM should consider for managing stallions in a herd that would be effective in tangibly suppressing population growth?(3)</p>	fxc0001
90.	<p>1. The legal sanctuary for wild horses and burros is the HMA. The HMA, under law, is to manage a wild population capable of "free-roaming behavior" and the definition of a wild population is one that can "reproduce itself." This proposal (alternatives presented) violates that aspect of law by: a. maintaining a non-reproductive population</p>	emc0115

Table C-4.C
Comments Related to Wild Horse Reproduction and Family Units

Comment No.	Comment	Cmt Ltr Code
91.	I am asking you to put an immediate stop to the sterilization of the 3 herds of wild horses for the sake of an eco-sanctuary/resort. The sanctuary should have fully functional mares, stallions & foals. A full family order, lead and protected by the stallions and lead mares.	rmc0008
92.	Should the eco-sanctuary resort become a reality, it should be the responsibility of the owner/operators to watch over the population and the growth with their ways and means.	rmc0008
93.	2. In consultation with experienced horse veterinarians, BLM should address the practicalities and risks associated with creating a population of spayed mares equivalent to the carrying capacity of the sanctuary.	rmc0009

Table C-4.D
Comments Related to Wild Horse HMA Boundaries and Existing Populations

Comment No.	Comment	Cmt Ltr Code
1.	An HMA is suppose to be an area for self-sustaining wild horse herds.	emc0002
2.	Personal observations provided by Craig Downer indicates that the majority of horses in the proposed RMP are in vigorous good condition; estimated between 4 and 5 on the Henecke scale. I agree with Craig Downer's assessment that, relative to the vast area of their 1971 migratory range, the herd IS underpopulated. BLM is mandated (again, by operaton of law) to balance the ecological equation by maximizing best management practices and science that enhance wild horse and burro habitat to insure genetic viability and continuity. Based on results, this is not the case.	emc0003
3.	Please note that the erection of fences should only provide for habitat enhancement/ rotation in order to compensate for drought and emergency impacts. Any containment of the eco sanctuary that would condemn 93% of the Spruce/Pequop, 27% of the Goshute, and 14%of the Antelope Valley HMAs is inconsistent/ non- compliant with management plan mandates.	emc0003
4.	We are concerned that horses will be removed from lands outside the fence, and the forage and other resources that are allocated to the horses will be handed over to sheep and cattle ranchers whose herds are degrading the lands and waters. If that occurs, very important pygmy rabbit, migratory bird, raptor and other wildlife habitats, across this landscape will suffer intensified disturbance - as the AMLs did not fairly balance uses based on differences in use of food, cover, and space.	emc0006
5.	This ecosanctuary is being advertised and promoted as "Saving Americas Mustangs". I consider this to be very misleading to the general public, if not in fact totally deceitful. In fact three true sanctuaries or HMAs for truly free wild mustangs will in fact be threatened and pushed toward extinction as her publically paid for fences are built. By erecting these fences mustangs will be denied access to their legal land, forage and water, forcing them to be removed from their HMAs. If Ms. Pickens, or any other private citizen, wishes to establish an ecosanctuary of non-reproducing herds, by adopting horses which are now in BLM Long Term Holding facilities, they have my very best wishes. However these sanctuaries, or resorts, should not be allowed on any of the original legal Herd Areas or on subsequently designated HMAs.	emc0007
6.	I would also point out that I protest the very low and non-viable AMLs that have been decided for the three of the HMAs which will be affected by Ms. Pickens ecosanctuary. Livestock AUMs should be reduced in these areas and the wild horses and burros should be given the principal allocation of forage, which should be over 50%.	emc0007
7.	I only just read about the proposal for an eco-sanctuary for wild horses; this sounds like a great idea, but why would three existing herds need to be destroyed by removing the mates and gelding the stallions? What kind of "wild" families would they be able to start? These herds have existed for a very long time and rather than destroying everything that gets in out way, couldn't we actually help preserve something? These horses live in family units and we don't have the right to destroy that. Please don't do this.	emc0009

Table C-4.D
Comments Related to Wild Horse HMA Boundaries and Existing Populations

Comment No.	Comment	Cmt Ltr Code
8.	1) The eco-sanctuary plan should not restructure/remove any current HMA land or turn HMAs into HAs. An ecosanctuary should not be put on HMA lands - there are plenty of other public lands available.	emc0011
9.	It is obvious that with less HMA land, there will be less forage and water for the remaining free roaming wild horses that are currently on the HMAs, and they will most likely be removed at a future date. While the free-roaming horses remain on the HMAs, there will be new fencing to keep the eco-sanctuary horses apart from the wild horses and enclosed. This will further cut off forage and water from the free roaming wild horses. Maybe the BLM could negotiate with Mrs. Pickens make some of the water from SAM's 66 water rights are made available to the remaining wild horses of the HMAs.	emc0011
10.	8) Wild horses lose their protection as wild horses when they are transferred to private maintenance, don't they? So you are actually planning to take the protection away from the remaining wild horses on these HMAs	emc0011
11.	this project eliminates 3 HMAs and the wild breeding horses in them. This action must be deemed contrary to the intent of the WFRH&B Act.	emc0017
12.	I am concerned about the wild horses being shut out of their traditional water sources by new fencing, and also concerned about the HMAs losing acreage due to this plan.	emc0023
13.	Why should the creation of a privately owned sanctuary have anything whatsoever to do with wiping out wild herds in lawfully designated HMAs? There is NO need for a trade-off or any hidden catches in this proposal.	emc0020
14.	According to the Scoping Project Brief, the agency aspires to manage the Spruce Pequop Herd Management Area (HMA) as an entirely non-reproducing (DEAD END) herd by replacing wild freeroaming stallions -- who are protected under federal law -- with castrated geldings. BLM is also seeking to make it a requirement that SAM entirely fence off the 500,000-acre Spruce Allotment, which, as BLM is well aware, which would reduce the acreage and allowable management level (AML) of the wild horses in the Goshute and Antelope Valley HMAs. As if this scenario is not bad enough, the agency is implying that in exchange for Ms. Pickens being bestowed the great privilege of being allowed to set up her "ecosanctuary", BLM is proposing to remove all of the mares from the Spruce Allotment, geld all the stallions, and also seeks to remove the mares and gelding the stallions in the surrounding Antelope and Goshute HMAs as well. This is nothing more than a recipe for extermination!	emc0020
15.	Not to mention, if only geldings would remain, where would all of the mares and foals be going? Would they be removed and warehoused along with the 50,000+ mustangs in bursting government corrals?	emc0020
16.	The original point of the "ecosanctuary" was to put a stop to the agency's secret plan to send the massive population of captured and sterilized wild horses already languishing in government short-term holding facilities to slaughter by giving them a safe place to live out their days without the threat of death looming over them. Now it seems that the BLM has set its sights on emptying these facilities of the imprisoned wild horses only to replace them with yet more mustangs captured and removed from newly zeroed out HMAs in the so-called Antelope Complex. This is an outrage! By what	emc0020

Table C-4.D
Comments Related to Wild Horse HMA Boundaries and Existing Populations

Comment No.	Comment	Cmt Ltr Code
	authority do you have the right to zero out lawfully designated wild horse areas at will?	
17.	Our organization spends a lot of contributions and time and labor building fences and cattle guard to keep people and the beautiful horses safe. The Department of Agriculture has cooperated with us in the past so we've saved the state a lot of time and money. Now well have the sanctuary to provide a safe place for our wild horses to forever be an asset to our wild ranges.	cfc0005
18.	I am writing to oppose the Mustang sanctuary plan proposed by Madeline Pickens, which involves fencing part of three HMA's in Nevada. This is a poorly conceived plan, which is bad for the horses, bad for the range and bad for the American public. There are other, better plans that would take horses out of holding and let them live out their lives in a sanctuary setting. Rather than protect the horses, the Pickens plan will rid our western public lands of the wild horses and burros that they are tasked to protect. Please continue to investigate other ways in which to safeguard and protect these horses and burros.	emc0029
19.	Removing ALL wild horses and sterilizing them from 3 HMA's for the sake of this eco-sanctuary IS NOT what taxpayers want for these herds.	emc0001
20.	According to BLM's proposal and the proposal for the SAM sanctuary, which covers part of these HMAs, it will require that these HMAs be restructured. If you make these HMAs "Herd Areas" it means no wild horses will be left in these areas. Any wild horses remaining in what is left of these HMAs will be fenced off from their historic ranges, migratory routes and water sources.	emc0002
21.	Since 1971, wild horses have been zeroed out from 111 herd areas representing over 20 million acres; this represents nearly half of the habitat originally designated for wild horses and burros under the Wild Free-Roaming Horses and Burros Act. In 70% of the remaining herd management areas, BLM's population targets are set at levels that will not ensure genetic viability. Given these numbers, any proposals for ecosanctuaries or holding facilities that result in a net loss to existing populations explicitly undermine the goals of wild horse preservation and the Wild Free Roaming Horses and Burros Act.	fla0000 baseltr1
22.	Therefore, any ecosanctuary proposals must be evaluated according to the following criteria to ensure that they: Will not result in a loss of habitat (HMA acreage) for non-captive wild horse or burro populations;	fla0000 baseltr1
23.	Since 1971, wild horses have been zeroed out from 111 herd areas representing over 20 million acres; this represents nearly half of the habitat originally designated for wild horses and burros under the Wild Free-Roaming Horses and Burros Act. In 70% of the remaining herd management areas, BLM's population targets are set at levels that will not ensure genetic viability. Given these numbers, any proposals for ecosanctuaries or holding facilities that result in a net	fla0000 baseltr2

Table C-4.D
Comments Related to Wild Horse HMA Boundaries and Existing Populations

Comment No.	Comment	Cmt Ltr Code
	loss to existing populations explicitly undermine the goals of wild horse preservation and the Wild Free Roaming Horses and Burros Act.	
24.	Therefore, any ecosanctuary proposals must be evaluated according to the following criteria to ensure that they: Will not result in a loss of habitat (HMA acreage) for non-captive wild horse or burro populations;	fla0000 baseltr2
25.	Since 1971, wild horses have been zeroed out from 111 herd areas representing over 20 million acres; this represents nearly half of the habitat originally designated for wild horses and burros under the Wild Free-Roaming Horses and Burros Act. In 70% of the remaining herd management areas, BLM's population targets are set at levels that will not ensure genetic viability. Given these numbers, any proposals for ecosanctuaries or holding facilities that result in a net loss to existing populations explicitly undermine the goals of wild horse preservation and the Wild Free Roaming Horses and Burros Act.	fla0000 baseltr3
26.	Therefore, any ecosanctuary proposals must be evaluated according to the following criteria to ensure that they: Will not result in a loss of habitat (HMA acreage) for non-captive wild horse or burro populations;	fla0000 baseltr3
27.	Strong consideration should be given to closing and removing all feral horses from the Spruce/Pequop Herd Management Area (HMA) due to the 97% overlap, as well as reducing the Appropriate Management Level (AML) of feral horses on the adjacent Goshute (27% overlap) and Antelope Valley (14% overlap) HMAs, the amounts of sanctuary-existing HMA overlap as reported in the BLM proposal document. It would be even better for the ecosystem and wildlife if the other two HMA's were also closed out and all feral horses removed and be replaced by the proposed feral horse sanctuary. This concept would reduce WH&B program management costs, provide easier management of feral horses in the better controlled environment of a sanctuary, and place the feral horses in an environment more readily available to the general public.	emc0034
28.	Additionally, those adjacent public lands should NEVER be fenced, they should be populated with wild free roaming horses in functioning family bands and zero cattle to replicate the days before cattle were put out to destroy the biology and eco-diversity of our western landscape.	emc0041
29.	What you should do is convert the cattle AUMs to horse AUMs and quite trying to sterilize every equine in sight, CELEBRATE the families of wild horses living wild on the land instead!	emc0041
30.	This proposed zeroing out of the adjacent HMAs is really an insult, one further abuse against the wild horses of America.	emc0041
31.	This is to let you know that I strongly oppose the creation of the Eco-sanctuary in Northeast Nevada in its current form. I oppose the following among other things including the: Creation of the sanctuary from three HMAs	fxc0003

Table C-4.D
Comments Related to Wild Horse HMA Boundaries and Existing Populations

Comment No.	Comment	Cmt Ltr Code
	Zeroing out wild horses in the HMAs	
32.	The real sanctuary of wild horses are the HMAs themselves created by a mandate of Congress under the Wild Free-Roaming Horse and Burro Act of 1971, Public Law 92-195.	fxc0003
33.	No to Madeline Pickens proposal... her publicly financed proposal will ruin three adjacent mustang sanctuaries cutting off food and water and resulting in all the wild horses on those sanctuaries having to be rounded up. Pickens can do what she wants on her land but it is not ok to wipe out three mustang sanctuaries in the process. PLEASE PROTECT OUR WILD HORSES!	emc0065
34.	There can be NO loss of habitat. There have been far too many Herd Management Areas that have disappeared already.	fxc0004
35.	This could and should be done without changing or reducing any of the HMAs, without adding any fencing and most importantly, without removing any of the Wild Horses or Burros from their Legal Herd Management Areas. A plan such as this would give the taxpaying American citizens something BENEFICIAL in return for their hard-earned tax dollars.	fxc0004
36.	As described in the scoping letter and in public meetings, there could be significant and irreparable damage to three legally designated wild horse herds if this BLM version of the SAM plan is initiated.	emc0040
37.	We wholeheartedly support SAM's efforts to return wild horses from short and long term holding facilities to a more natural setting. However, these goals must be achieved without damaging the legally designated wild herds residing within the project area (Spruce/Pequop, Goshute, and Antelope Valley.	emc0040
38.	Please adjust the boundaries and management objectives of existing wild horse herd management areas (HMAs) within or near the proposed eco-sanctuary;	emc0055
39.	Please (1) adjust the boundaries and management objectives of existing wild horse herd management areas (HMAs) within or near the proposed eco-sanctuary	emc0055
40.	Trading off a sanctuary for removing horses from their original range is not a fair, nor legal tradeoff. This says it all. The Wild Free-roaming Horses and Burros Act of 1971 says it all: Public Law 92-195 #1334 states "Nothing in this section shall be construed to prohibit a private landowner from maintaining wild free-roaming horses or burros on his private lands, or lands leased from the Government, if he does so in a manner that protects them from harassment, and if the animals were not willfully removed or enticed from the public lands." It appears by law not only do the wild, free roaming horses have a right to their HMAs but also to Madeleine's private and allotted lands if she allows them access.	fla0015
41.	Please construct your management plan for the Antelope Complex to BOTH maintain existing wild horse herds, AND allow conversion of cattle AMLs to use by previously wild horses liberated from holding pens!	fla0045
42.	Allowing this sanctuary should never impact other free roaming horses.	fla0056

Table C-4.D
Comments Related to Wild Horse HMA Boundaries and Existing Populations

Comment No.	Comment	Cmt Ltr Code
43.	I am deeply troubled but the thought of zeroing out the wild horse herds living in the three HMAs that comprise the Antelope Complex and will be affected by the proposal. Surely there is a better way.	fla0061
44.	However, one must question if this even is legal to do, to use the public lands and not her private lands, as all the other holding facilities are required to do? Three true sanctuaries or HMAs for true and free running Mustangs will be threatened toward extinction as she builds her publically paid for fences. These fences will deny these Mustangs their legal space, forage, and water for the future, forcing them to have to be removed from their HMAs.	fla0074
45.	These HMAs have to be preserved as they are, or be enhanced in any decision that is made concerning Madeleine's eco sanctuary promoting "Saving America's Mustangs."	fla0074
46.	That said - even the slightest idea that the surrounding HMAs would be wiped out in order to have this sanctuary is unbelievable. I disagree absolutely with rounding up the horses in these HMAs. Surely there is some way to keep the wild horses there AND have the horses from the holding pens be able to come to SAM.	fla0079
47.	The establishment of this sanctuary will in no way replace the need to leave our wild mustangs in their natural habitat. The purposes are very different.	fla0086
48.	ANY ECO-SANCTUARY should be used solely to alleviate the overcrowding of CURRENT captive wild horses (over 50,000 now) and NOT USED as a convenient to remove wild horses from area and adjacent HMAs that are not now or in the near future overpopulated. To operate in any other manner will not only be in poor faith, but blatant misuse of a good plan by a good citizen and supported by good citizens of this country. I will not support the BLM in a dishonest plan to use Ms. Pickens sanctuary plan to further empty adjacent HMAs of wild horses. Use the Pickens plan to house already captive wild horses only.	fla0097
49.	I hope you will listen to the comments of us, sometimes called The Silent Majority, asking you to cease the efforts to impose conditions on the Antelope Valley HMA. It is the right thing to do.	fla0102
50.	Unfortunately what Madeline Pickens rather than helping mustangs wants to ruin three existing mustang sanctuaries Three true sanctuaries or HMAs for true Mustangs will be threatened toward extinction as she builds her publically paid for fences to make her penned areas for gelded mustangs.. These fences will deny surrounding wild Mustangs their legal space , forage, and water for the future forcing them to have to be removed from their HMAs.. These HMAs have to be preserved as they are, or be enhanced in any decision that is made concerning Madeleine's eco sanctuary promoting "Saving America's Mustangs."	emc0064
51.	I am opposed to the project as stated in the documents and request the BLM immediately stop this proposed project to protect the natural habitat for the wild Mustangs, to preserve the naturally breeding American Mustang herds as they exist on BLM lands, and allow them to remain to breed and develop as wild and free. The Mustangs must be preserved	emc0066

Table C-4.D
Comments Related to Wild Horse HMA Boundaries and Existing Populations

Comment No.	Comment	Cmt Ltr Code
	as American history, as free-roaming animals, without barriers, as the antelope and deer. They should not be subjected to HMA's that do not recognize the needs of the Mustangs for water, grazing, natural herd management amongst themselves, weather patterns, and natural mineral deposits.	
52.	BLM needs to leave the Mustangs to their property, to freely roam with no fences, to give them back their land, to roam like the antelope and deer (and hunters).	emc0066
53.	Wild horses have already lost over 150 herd areas and over 20 million acres- nearly half of the acreage designated for their use. The existing wild herds are remnants of what once existed in the West. It is unconscionable that BLM would contemplate effectively zeroing out three more herds to accommodate a plan, which they have constructed.	emc0040
54.	The vast majority of the herds are already under-populated and do not meet the minimum standard for genetic viability as stated by E. Gus Cothran, PhD, the foremost equine geneticist in the United States and a BLM genetic analyst for wild horses. Under population is a serious threat to the survival of numerous herds in the West.	emc0040
55.	The HMA of most concern is the Spruce/Pequop, 93% of this herd resides within the proposed eco-sanctuary boundaries. We fear, based on BLM's language, that this HMA will be zeroed-out in order to accommodate the eco-sanctuary plan. A lesser portion of Goshute and Antelope Valley HMAs are encompassed within the proposed eco-sanctuary boundaries, but they too would be adversely and permanently impacted by the proposal as presented here and in public meetings.	emc0040
56.	Please reserve the existing 34 million acres of the wild public lands where all the wild horses currently roam, restricting human use, development and livestock grazing to preserve and protect our wild horses and burros and their natural habitat.	emc0070
57.	Spruce Allotment, Antelope and Goshute HMAs herds would be destroyed by these actions. Why is it that those who can't speak for themselves are always under fire by you guys? Leave them alone!	emc0078
58.	<input type="checkbox"/> Section 10 of the H&B Act states: "Nothing in this Act shall be construed to authorize the Secretary to relocate wild free-roaming horses or burros to areas of the public lands where they do not presently exist.: Barring congressional action, the BLM has no authority to expand HMAs. An amendment to exempt this provision, thereby expanding HMAs to untold new areas, would allow for the unfettered expansion of the wild horse population-to the detriment of multiple-use on public lands.	emc0084
59.	<input type="checkbox"/> The ranch purchased by Mrs. Pickens possesses three HMAs. One is fully encompassed by the boundary of the allotment; the other two straddle the boundary. Because statute discourages fencing of HMAs or portions of HMAs, we question how sanctuary horses will be prevented from grazing on adjacent ranchers' allotments. Also inevitable would be the comingling of sterile sanctuary horses and the adjacent HMA's horses, which is not authorized by the H&B Act.	emc0084

Table C-4.D
Comments Related to Wild Horse HMA Boundaries and Existing Populations

Comment No.	Comment	Cmt Ltr Code
60.	I have also reviewed the informative document and visited the Goshute, Dolly Varden and Antelope areas recently viewing some of the wild horses who would be affected and observing their habitat and some of their springs. This wild horses I saw were vigorous and in good condition, estimated at between 4 and 5 on the Henecke scale. There were very few of them relative to the vast legal area of their HMAs. I would not consider them at all overpopulated, but rather quite underpopulated and far from filling their ecological niche here. I am concerned that the great majority of the forage in the affected HMAs is going to livestock and that this is very much contrary to the Wild Free-Roaming Horses and Burros Act of 1971 which plainly states that the resources of the herd areas or territories where they were found in 1971 should be "devoted principally" to the wild horses or burros. This is simply not happening.	emc0085
61.	4. Numbers: The BLM document states that there are 1,384 wild horses in the 3 Wild Horse Management Areas - the Spruce/Pequop, Goshute, and Antelope Valley HMAs. The Federal Register Notice states that SAM proposes to accommodate up to 900 wild horses. Will BLM capture and remove the existing 1,384 animals? Or will BLM supply up to 900 of these or will it supply 900 other wild horses to the sanctuary? We are struggling to see the net benefit to the public of this proposal?	emc0087
62.	The fencing will intersect 3 HMAs, and as such, the 3 HMA s horses won't be able to sustain themselves given their new limitations of water, forage, and space. The fencing should not be built through the 3 HMAs and the HMAs with the current AMLs should stand as they are. If the horses are dependent on water from Madeleine's allotment, then Madeleine should give them access to the water.	emc0089
63.	There has been some discussion on neighboring wild horse herds. It is my understanding they will be converted to HA status and the herds zeroed. What happens to the horses that are inevitably missed during that process? Will they be managed by the BLM? How will they be kept out of the sanctuary? This needs to be clarified in a final draft.	emc0090
64.	Since 1971, wild horses have been zeroed out from 111 herd areas representing over 20 million acres; this represents nearly half of the habitat originally designated for wild horses and burros under the Wild Free-Roaming Horses and Burros Act. In 70% of the remaining herd management areas, BLM's population targets are set at levels that will not ensure genetic viability. Given these numbers, any proposals for ecosanctuaries or holding facilities that result in a net loss to existing populations explicitly undermine the goals of wild horse preservation and the Wild Free Roaming Horses and Burros Act.	flc0000
65.	Therefore, any ecosanctuary proposals must be evaluated according to the following criteria to ensure that they: Will not result in a loss of habitat (HMA acreage) for non-captive wild horse or burro populations;	flc0000
66.	The eco-sanctuary may do more harm than good. For example, 10% of the land is currently an HMA. Spruce-Pequop HMA has 93% of its land in the eco-sanctuary boundary. What will happen to the horses in Spruce-Pequop and the other HMAs? Will they be zeroed-out in favor of long-term solution to "excess" geldings? This is not natural. The BLM is to	rmc0001

Table C-4.D
Comments Related to Wild Horse HMA Boundaries and Existing Populations

Comment No.	Comment	Cmt Ltr Code
	manage to promote free-roaming behavior.	
67.	Horse Herd Management Under current laws and regulations, the introduction or "relocation" of non-native, feral horses into a horse-free area outside an HMA is forbidden. The subject property includes an area of approximately 30% outside the established HMAs. Is it anticipated that use will include these areas?	rmc0002
68.	Will there be means to identify the sanctuary herd from feral horses outside the area and the means to maintain this segregation in case of a failure in the division boundaries?	rmc0002
69.	Nowhere is it within the letter or spirit of the Wild and Free-Roaming Horse and Burro Act of 1971 to remove historically present, functioning wild horse herds from public land and replace them with a nonreproducing "herd" of horses gathered from a variety of other locations. Please DO NOT move forward with approving the Mustang Monument if it involves removing or reducing existing functioning wild herds!	emc0097
70.	Having a more nature-based area to which currently held Short Term Horses are transferred for Long Term Holding is definitely an improvement over the current Short Term Holding situation. However, this can never be viewed as a possibility if it involves removing more functioning wild horses from public lands.	emc0097
71.	Do not remove wild horses from the Antelope Complex to make room for the development of the Mustang Monument.	emc0097
72.	Please maintain the mustangs current and rightful HMA's.	emc0099
73.	I am absolutely opposed to a plan involving the removal of wild mustangs surrounding Madeleine Pickens' land in order for her to have a place where visitors can see her gelded horses in an unnatural setting.	emc0102
74.	The point of the sanctuary was to re home wild horses already removed from their habitat. WILD horses. In the wild, they are NOT gelded. And removing surrounding wild horses from their home to enable this place defeats the ENTIRE purpose of the sanctuary.	emc0104
75.	Drop this absurd idea of removing those horses to allow the eco sanctuary.	emc0104
76.	a) The value of having 3 herds is that if something catastrophic happens to a herd two others still remain. To have healthy horses there must be a sufficiently large gene pool or inbreeding will result and lead to horses that cannot survive in the wild. b) Putting the safety of all the herds into the hands of just one group or organisation or individual is VERY risky. Damage to all three herds is likely to be done before it can be stopped.	emc0105
77.	So in order to set up the eco-sanctuary, it would be necessary to remove all of the mares from the Spruce Allotment, gelding all the stallions, and also removing the mares and gelding the stallions in the surrounding Antelope and Goshute	emc0106

Table C-4.D
Comments Related to Wild Horse HMA Boundaries and Existing Populations

Comment No.	Comment	Cmt Ltr Code
	<p>HMA's? Nonsensical to anyone that cares about wild horses (and burros) as protected under the Wild Horse and Burro Act.</p> <p>This would mean the complete destruction of three wild horse herds in Nevada. The BLM must not follow this very wrong path. Sterilizing and zeroing out wild horse herds all over Nevada and the west, and replacing them with sterile herds of unrelated horses is not what the legal act states. Show some respect for the law and what Americans want or find something else to do.</p>	
78.	<p>We at DreamCatcher recognize and support Madeleine Pickens' vision and goals for SAM to restore captured wild horses in short-term holding to the natural habitat land and life of freedom they were born into. Her project seeks to benefit them, but the conditions BLM has imposed upon the SAM sanctuary would result in net harm to present and future wild horses living on the three subject HMAs, namely, Spruce-Pequop, Goshute, and Antelope. Therefore, with profound disappointment we find we cannot support the plan as presented by BLM.</p>	emc0107
79.	<p>In the public "scoping" meetings, BLM presented alternatives that didn't really provide much of a choice since all possible "alternatives" offered by BLM included these unacceptable conditions:</p> <p>1) the roundup and permanent removal of all mares presently on the Spruce allotment within what would become the sanctuary boundary, and the replacing of those mares with geldings from short-term holding even as the newly captured mares are themselves sent to short-term holding. The 1971 law states that wild horses are to be considered an integral ("vital," "fundamental," "essential," "core") part of the natural system of the public lands -- except for mares? This is a Herd Management Area (HMA) we're talking about, where wild horses (and burros if present) are to be given priority as the primary multiple user.</p>	emc0107
80.	<p>In the public "scoping" meetings, BLM presented alternatives that didn't really provide much of a choice since all possible "alternatives" offered by BLM included these unacceptable conditions:</p> <p>3) "restructuring" the HMAs in some fashion, i.e., by redrawing boundaries and/or reducing AML. The strong likelihood then exists that the horses remaining outside the sanctuary boundary would be deemed by BLM to be unsustainable, and the remaining HMAs would be zeroed out and turned into Has.</p>	emc0107
81.	<p>Effectively destroying three HMAs (because each HMA will be seriously interrupted by the perimeter fencing of the sanctuary and the removal of mares), which are home to over 1500 horses, in order to create a sanctuary is contrary to and works against the purpose of the HMAs and the 1971 Act itself.</p> <p>The HMAs are the only places wild horses and burros legally can live. The law clearly states said wild horses and burros are to be considered an "integral" part of the natural system of these public lands and, in keeping with that principle, clearly states "all management activities shall be at the minimal feasible level" so that the wild horses are interfered with as little as possible.</p>	emc0107

Table C-4.D
Comments Related to Wild Horse HMA Boundaries and Existing Populations

Comment No.	Comment	Cmt Ltr Code
	With that standard in mind, breaking up families, removing all mares, gelding all stallions, stopping all reproduction, installing fencing which divides and disrupts the natural free-roaming behavior of wild horses on three vast HMAs is the antithesis, the very opposite, of the light-handed management Congress called for when it chose the "minimum feasible" language as the law.	
82.	DreamCatcher submits that the HMAs are already public lands sanctuaries where natural wild horse life is to be protected. Any sanctuary proposal that includes any net loss to a Herd Management Area must be rejected as unacceptable, including but not limited to losses in either (or both) the Appropriate Management Level/"AML" or acreage.	emc0107
83.	In contrast, fencing the SAM sanctuary and removing mares as BLM intends violates the multiple use mandate because it deprives the main stakeholder --the wild horse population of over 1500 animals-- of their historic, documented use of these HMAs.	emc0107
84.	How could something that started out with such good intentions turn into a plan to wipe out three HMAs and all the wild horses therein and forever destroy the native equine's freedom while placing them at risk of going to slaughter, how could that happen?	emc0108
85.	Under proposed ?compromises? to the original Pickens plan, Mustang Monument now becomes a Long-Term Holding facility, situated within the bounds of three existing Horse Management Areas. That the facility would accept unadoptable horses from so-called "Short Term Holding" facilities, and allow them greater freedom within the confines of a larger area is worthwhile - but NOT if the arrangement requires devastation of existing herds on Congressionally-mandated Wild Horse Management Areas.	emc0111
86.	Proposed conditions for implementation of the facility represent a perversion of both the advertised intention of Mustang Monument, and a violation of the letter and spirit of the Free-Roaming Wild Horses and Burros Act of 1971. The ?restructuring? of existing viable herds, as suggested in the BLM proposal, spells DOOM; not only for some of the last remaining TRULY wild horses in the world, but for all of the wild herds in the state of Nevada.	emc0111
87.	I do not support any plans that involve fencing off the proposed 550,00 acres of land from the wild horses or rounding up the existing horses found in the subject HMAs.	emc0112
88.	Under this proposed plan, horses are subject to loss of water, habitat and reproducing families and the disappearance of HMA's which are already sanctuaries supported by the public if remained undisturbed. Any proposal to remove existing wild horses and make room for already rounded-up horses is a waste of money and not at all at the best interests of the horses being removed. They should be left alone.	emc0112
89.	As an American citizen, taxpayer and life-long visitor to the state of Nevada, I oppose the Interior Department's (Bureau of Land Management) proposal to remove existing wild horses to make room for already rounded-up geldings on public	emc0114

Table C-4.D
Comments Related to Wild Horse HMA Boundaries and Existing Populations

Comment No.	Comment	Cmt Ltr Code
	lands. It is not only unethical and unlawful but it is not in the best interests of the animals removed ... and will be ripe for intense litigation.	
90.	Based upon even the most brief examination of the 1971 Act, the plan to remove reproducing families from their existing HMA and replacing them with geldings is not lawful and a complete violation of the law and the spirit of the Congressional Act.	emc0114
91.	Without migratory routes to water and grazing within the lawful HMA's, the BLM is proposing the possibility of labeling the remaining wild horses outside the fencing as not viable and rounding them up also. This will put an end to the existing three HMA's. No more wild horses.	emc0114
92.	As proposed by BLM, this Eco-Sanctuary Plan is not now and can never be acceptable, because in it Wild Horses are subject to loss of water, loss of life and reproducing families, loss of habitat and the disappearance of HMA's which are already existing tax payer supported sanctuaries.	emc0114
93.	However, we believe that these goals can and must be realized without harm to the freeroaming populations of wild horses that reside in the Spruce Pequop, Antelope, and Goshute Herd Management Areas (HMAs).	fxc0001
94.	<p>After reviewing the scoping brief, we are concerned that, in proposing to partner with SAM on a project intended to help wild horses, the BLM has created a scenario that will actually result in net harm the wild freeroaming populations in the area.</p> <p>The Scoping Brief describes a proposal to create a "privately-managed, non-reproducing wild horse ecosanctuary under Federal ownership ... located on approximately 14,000 acres of private land and 508,000 acres of public land inside the current Spruce Allotment."</p> <p>According to the scoping brief, the proposal will affect the Antelope Complex, which consists of three existing Herd Management Areas (HMAs):</p> <ul style="list-style-type: none"> • Spruce Pequop HMA (240,744 acres)- 93 percent in the allotment; • Goshute HMA (267,277 acres)- 27 percent in the allotment; • Antelope Valley HMA (504,714 acres)- 14 percent in the allotment. <p>The scoping brief states:</p> <p>The proposal would require amending the Wells Resource Management Plan in two ways:</p> <ul style="list-style-type: none"> o restructuring three existing wild horse herd management area (HMA) boundaries and revising management objectives; and • removing and retiring the portion of the Spruce Grazing Allotment east of U.S. Highway 93 from the N I grazing district <p>"The proposal would result in the adjustment and/or modification of portions of the existing SprucePequop, Goshute, and Antelope Valley HMAs to create a new modified herd management area to be managed as an eco-sanctuary. Those</p>	fxc0001

Table C-4.D
Comments Related to Wild Horse HMA Boundaries and Existing Populations

Comment No.	Comment	Cmt Ltr Code
	<p>areas of the HMAs that are not within the proposed Eco-Sanctuary would be evaluated to determine their ability to sustain a viable horse population with reduced acreage and water resources." (Emphasis Added)</p> <p>This language raises the alarming possibility that:</p> <ul style="list-style-type: none"> • the Spruce Pequop HMA will be zeroed out for wild free-roaming horses and converted to an HMA managed for an entirely or partially non-reproducing herd; and • the Goshute and Antelope Valley HMAs could also be zeroed out, or subjected to a reduced AML, or managed partially or entirely for non-reproducing horses. <p>This scenario would violate the mandates set forth under the Wild Horse Act, and would result in a net harm to the wild free-roaming horse populations in the Antelope Complex. It is important to note that there is more at stake than just the few hundred horses presently living in the Spruce Pequop HMA or the hundreds horses living in the Goshute and Antelope Valley HMAs. The proposal could set a precedent that would negatively affect future generations of horses, potentially rendering HMAs within the Antelope Complex nonviable and subject to future actions to zero out the natural, wild, free-roaming herds.</p>	
95.	<p>However, what is objectionable is when such an ecosanctuary is used as the basis for significantly reducing both the number of wild horses - with full reproductive capacity- and the acreage available to those wild horses that the Act intended to protect. Therefore, while a sanctuary of this kind has benefits to those horses that are otherwise in holding facilities, the overall harm or benefit to wild, reproductive horses must be evaluated on a case-by-case basis. In our view in this case, because of the way BLM is proceeding, the proposed ecosanctuary's harms to wild horse population numbers and habitat far outweigh the benefits, because it would create an ecosanctuary for non-reproducing horses that are not "wild" in the meaning of the statute at the expense of the wild horse populations that have long roamed these lands.</p>	fxc0001
96.	<p>On page 2 of the proposal there is attention drawn to two actions that this proposal would require by way of amendments to the Wells Resource Management Plan. One of the actions calls for "restructuring three existing wild horse herd management area boundaries and revising management objectives. Later on page 10 of the document there is an explanation of the three wild horse herd management areas (HMAs) including "the Spruce/Pequop, Goshute and Antelope Valley HMAs". Based on the information provided, it is reported that the current estimated population totals for the three HMAs is " 1,384 wild horses". The table provided indicates the total combined Appropriate Management Levels (AML) for these HMAs to be between 277-464 wild horses. In effect there are somewhere between three to five times more wild horses in this general area than AML.</p>	emc0083
97.	<p>Any preferred alternative to establish the eco-sanctuary for a non-reproducing herd of wild horses inside the boundaries of the outlined area, should also include (1) a provision for total removal of all of the wild horses on the three existing HMAs and (2) deletion of those HMAs status as HMAs. This consideration is mentioned on page 2, which offers the two</p>	emc0083

Table C-4.D
Comments Related to Wild Horse HMA Boundaries and Existing Populations

Comment No.	Comment	Cmt Ltr Code
	bullets of required amendments to the Wells Resource Management Plan, but we believe it is essential that such an action be clearly spelled out as pmt of the prefened alternative and interwoven into a strategy which connects the consequences of establishing an eco-sanctuary with zeroing out the three existing HMAs and assurance that horses within the eco-sanctuary will not be authorized to roam outside of the proposed project area.	
98.	As we indicated in our comments for the EA process for the Snow Water Lake and Warm Creek Allotments, we suspected that this effort to convert use to privately owned horses would have interplay with an eventual eco-sanctuary proposal. Again, we are concerned and interested to learn the "inventory control" process to be used in order to properly oversee that wild horses on the eco-sanctuary and other horses are not co-mingled or jumbled into a non-transparent mix of horses on the eco-sanctuary and allowed to go elsewhere or non-eco-sanctuary horses allowed to use the eco-sanctuary project area.	emc0083
99.	l. The legal sanctuary for wild horses and burros is the HMA. The HMA, under law, is to manage a wild population capable of "free-roaming behavior" and the definition of a wild population is one that can "reproduce itself." This proposal (alternatives presented) violates that aspect of law by: d. removes existing populations from areas designated to the wild horses	emc0115
100.	But the existing herds should not be removed. We must not zero out the herds, or their extinction will be guaranteed, and I will personally hold you responsible.	rmc0008
101.	4. BLM should evaluate the risk of stallions entering the sanctuary through Highway 93 and Alternate Highway 93 fences if the sanctuary were populated with geldings, open mares or spayed mares. If there is any consideration of the population being entirely stallions, then the risk of mares entering the sanctuary must also be evaluated.	rmc0009

Table C-5.A
Comments Related to Water Resources

Comment No.	Comment	Cmt Ltr Code
1.	i.e., Plus the SAM fence will prevent wild horses from access to water in that S.W. Sanctuary area where Fence will be. Foraging yes, but no access to water because that is inside the fence.	emc0002
2.	There should be no internal division fences, or extensions of watering sites. These arid lands simply cannot withstand intensified uses.	emc0006
3.	It is obvious that with less HMA land, there will be less forage and water for the remaining free roaming wild horses that are currently on the HMAs, and they will most likely be removed at a future date. While the free-roaming horses remain on the HMAs, there will be new fencing to keep the eco-sanctuary horses apart from the wild horses and enclosed. This will further cut off forage and water from the free roaming wild horses. Maybe the BLM could negotiate with Mrs. Pickens make some of the water from SAM's 66 water rights are made available to the remaining wild horses of the HMAs.	emc0011
4.	11) And last, but by no means least, at a public meeting, Mr. Brian Fuell pointed to an area that is currently part of the Antelope Valley HMA, and stated that there was little water in that area. You know, even if there isn't surface water, there is an aquifer underneath, and the BLM has at least 6 water rights in the very area he pointed at. The BLM could make water available for the remaining wild horses and NOT restructure/remove almost a third of the Antelope Valley HMA.	emc0011
5.	If there is not enough water for wildlife and or horses, then there should not be for cattle.	emc0013
6.	I am concerned about the wild horses being shut out of their traditional water sources by new fencing, and also concerned about the HMAs losing acreage due to this plan.	emc0023
7.	I understand that, as of now, ALL the current alternatives presented require the "ecosanctuary" to be fenced, prohibiting mustangs from accessing life-saving forage and water as well as space to exhibit their natural wild and free-roaming behavior. Such fencing would dissect the three existing HMA's, denying the mustangs in those areas space to roam and cutting them off from seasonal forage and water sources. These obstructions and restrictions would cause great hardship for the wild horses and would seriously impact their ability to survive on their range.	emc0020
8.	The analysis should include evaluation of the suitability of the 1990's carrying capacity given the diminishing range conditions and poor water availability observed in the last years of the previous livestock permit while also clearly describing the process and rationale in any AUM conversion.	emc0018
9.	The other passive livestock distribution control measure that has been mentioned is control of water availability, (turning off and on water troughs). Given the natural water that exists within the boundary of the eco-sanctuary we do not believe that this measure alone will be sufficient to control horse distribution. Additionally this measure may have effects on smaller more localized wildlife species that may not be able to adapt to loss of a proximate water source.	emc0018

Table C-5.A
Comments Related to Water Resources

Comment No.	Comment	Cmt Ltr Code
10.	The area in which to be fenced is already HMA & this proposed need to fence it is a complete waste of tax payer money & it would be cutting off the only water supply in the area to the other HMA's	emc0043
11.	<p>1. Taylor Western Resources (TWR) plans to reopen and mine copper at the Victoria Mine, which was initially developed and operated by Anaconda Copper Company in the 1970s. The mine is located in Section 5 of Township 28 North, Range 66 East in the Dolly Varden Mountains of Elko County. The mine is approximately 12 miles from US Highway 93A and access to the mine is on County Road 795.</p> <p>2. TWR wishes to inform the BLM and the proponent that, as owner of water rights in the area, TWR is concerned about water rights and that we are willing to meet with the proponent and BLM to discuss cooperative development which supports the Eco-Sanctuary and allows for TWR to implement the Victoria Mine plans.</p>	emc0032
12.	5. There are several springs in the area. BLM should monitor the springs on public land and ensure your decisions do not negatively impact the quality of springs, spring water and spring habitat on private lands.	emc0032
13.	5. There are several springs in the Dolly Varden Mountains area and water is a critical resource. BLM should monitor the springs on public lands and ensure that your decisions regarding the Eco-Sanctuary do not negatively impact the quality of springs, spring water and spring habitat.	emc0033
14.	The proposed sanctuary boundary should be placed outside the Goshute Peak and South Pequop Wilderness Study Area boundaries. As clearly documented in the BLM's Antelope Complex Gather Capture Plan and EA (November 2010, pages 77-85), feral horses have already severely impacted the few springs and seeps and their associated critical to wildlife riparian environments. The proposed feral horse sanctuary boundary fence should be built along the west foothills WSA boundary to exclude feral horses from continuing to damage and destroy the limited and precious water resources to preserve them for indigenous wildlife use. The fences built around the sanctuary boundary should be constructed in as wildlife "friendly" manner as possible to allow free passage through the feral horse sanctuary. Exclusion of feral horses from these two WSA's is crucial as the excessive trampling and compaction around springs and seeps, along with the numerous feral horse trails created by excessive numbers of feral horses, inhibit native vegetation growth and induce spring snowmelt and precipitation runoff resulting in erosion. This instead of water percolation into the ground to recharge ground water that provides the source of water for the few critical springs and seeps in the area. Even if feral horses are excluded from these areas it will take years, if not decades, for natural annual freezethaw action and solifluction processes to loosen the feral horse compacted soils and for natural slope angles to recover that will hopefully allow native vegetation and ground water levels to recover. If this action is taken, it is highly recommended that the BLM closely monitor the springs and seeps and their associated critical riparian environments during recovery to ensure invasive and noxious weeds do not overwhelm these precious resource areas. Wherever possible manmade	emc0034

Table C-5.A
Comments Related to Water Resources

Comment No.	Comment	Cmt Ltr Code
	water sources close to the sanctuary boundary should be modified to provide water for wildlife outside the sanctuary boundary to prevent aggressive feral horse behavior towards wildlife and to provide water for wildlife during times of drought or whenever required for the benefit indigenous wildlife species.	
15.	Ms. Pickens will have over 60 water rights in the area. This is an absolute sham and should not go forward.	fxc0003
16.	We have deep concerns regarding water resources. BLM admits that, "those areas of the HMAs that are not within the proposed eco-sanctuary would be evaluated to determine their ability to sustain a viable horse population with reduced acreage and water resources." The fencing, once erected by the eco-sanctuary, would block wild horses in other parts of these HMAs from crucial water sources, such as Dolly Varden Spring. This could lead to a scenario in which BLM chooses to remove all the wild horses from all three HMAs, as they will not have regular access to water.	emc0040
17.	Who will own these horses? It appears the U.S. Government will retain ownership of the horses while compensating SAM for management of the horses. This raises many legal questions which must be satisfactorily answered prior to any final decision by the BLM. One such question is whether water rights may be retained if livestock AUMs are converted for use by federally-owned wild horses. Nevada state water law requires beneficial use of private water rights on the range to maintain the water right. Without owning livestock, how will the BLM or Mrs. Pickens prove beneficial use? The BLM cannot legally own livestock, and SAM cannot put the private water to beneficial use unless it holds title to the horses--in which case the horses would be reclassified as domestic. Certainly, the agency would not contemplate paying for the management of private domestic horses on public lands.	emc0084
18.	The current water on the allotment is for livestock use. There is no conversion to wild horse use. Placing these water rights to uses which are not covered by state law, jeopardizes the water right. If the water right is lost for any number of reasons SAM would have to haul water to the horses. How will this obstacle be addressed by SAM?	emc0090
19.	How will existing livestock and wildlife water rights be protected and maintained? The water permits currently held by the SAM organization are for stock watering purposes with proven beneficial use. If these permits are converted from livestock AUMs to support a larger population of wild horses, will they lose beneficial use?	rmc0002
20.	The scoping document states that water is available and certificated on the Spruce Allotment and includes future expansion of water wells and stock water areas. However, Elko County believes that the water rights attached to the Spruce Allotment are for livestock not wild / feral horses.	rmc0003

Table C-5.A
Comments Related to Water Resources

Comment No.	Comment	Cmt Ltr Code
21.	It was observed on the RAC tour that BLM has been hauling water to this specific herd management area. There is no reliable water source at this time. It was also noted that there was significant resource damage surrounding the recently installed guzzler and trough where BLM has been hauling water to this area. SAM and/or BLM need to take responsibility to cure the lack of reliable water within the western part of the Spruce-Pequop HMA. This RAC recommends BLM remedy this situation before turning horses out. If not remedied, then again BLM is setting the horses and SAM up for failure.	emc0095
22.	<p>Water rights and abiding by Nevada Water law</p> <p>Under the Proposed Plan, the SAM organization plans to manage wild horses within the Eco-Sanctuary using water resources. The water permits currently held by the SAM organization are for stock watering purposes, as such; adheres to Nevada Water law as proving to be beneficial use. With the conversion of cattle animal unit months (AUMs) to support a larger wild horse population on the Eco-Sanctuary, the SAM Organization no longer can prove beneficial use. As we understand the position of SAM to manage the federally owned horses using movement to and from water developments, we ask:</p> <ul style="list-style-type: none"> - What water rights will be used to water wild horses? - Since the ownership of SAM's water rights is still in question, what alternatives are going to be considered as to manage horses properly on Spruce Allotment? 	emc0110
23.	Under this proposed plan, horses are subject to loss of water, habitat and reproducing families and the disappearance of HMA's which are already sancturies supported by the public if remained undisturbed. Any proposal to remove existing wild horses and make room for already rounded-up horses is a waste of money and not at all at the best interests of the horses being removed. They should be left alone.	emc0112
24.	<p>On page 3 of the Proposed Northeast Nevada Wild Horse Eco-Sanctuary the discussion addresses water sources which occur within the proposed project area. The proposed documentation, provided thus far, fails to address the resolution of water rights for an unrecognized beneficial use.</p> <p>The subject of "Conversion to Horses" is dealt with at the bottom of Page 2 in the context of forage, but there is no indication of how water rights will be converted and maintained as "livestock water rights" when the animals being watered are not "livestock". Non-use of water rights, or placing these water rights to uses which are not covered by state law, jeopardizes the long-term assurance that water will be available for sustaining the project and requires a properly executed decision by the Nevada State Engineer's office.</p> <p>We consider it necessary for changes in existing water rights (which we contemplate as being "livestock water rights"), in use applications and decisions. We believe that these requirements need to be considered and documentation provided that authority is granted for such conversion.</p>	emc0083

Table C-5.A
Comments Related to Water Resources

Comment No.	Comment	Cmt Ltr Code
25.	I. If this sanctuary becomes reality, it must be non-reproducing. Therefore, we ask BLM to evaluate the behavior and its impact on forage, water and wildlife of a herd of geldings, spayed mares, or a combination of the two in numbers equivalent to the carrying capacity of the sanctuary.	rmc0009

Table C-5.B
Comments Related to Fencing

Comment No.	Comment	Cmt Ltr Code
1.	i.e., Plus the SAM fence will prevent wild horses from access to water in that S.W. Sanctuary area where Fence will be. Foraging yes, but no access to water because that is inside the fence.	emc0002
2.	Please note that the erection of fences should only provide for habitat enhancement/ rotation in order to compensate for drought and emergency impacts. Any containment of the eco sanctuary that would condemn 93% of the Spruce/Pequop, 27% of the Goshute, and 14% of the Antelope Valley HMAs is inconsistent/ non-compliant with management plan mandates.	emc0003
3.	We are very concerned about the adverse impacts of the large-scale fencing proposal with this project - including its impacts in concentrating horse use - as well as livestock use - on pygmy rabbit, loggerhead shrike, Brewer's sparrow, sage sparrow, sage thrasher, sage-grouse and other very important native wildlife habitats, and the impacts on birds that may collide with the fence and die.	emc0006
4.	BLM must consider a broad range of alternatives besides fencing.	emc0006
5.	There should be no internal division fences, or extensions of watering sites. These arid lands simply cannot withstand intensified uses.	emc0006
6.	I understand that, as of now, ALL the current alternatives presented require the "ecosanctuary" to be fenced, prohibiting mustangs from accessing life-saving forage and water as well as space to exhibit their natural wild and free-roaming behavior. Such fencing would dissect the three existing HMA's, denying the mustangs in those areas space to roam and cutting them off from seasonal forage and water sources. These obstructions and restrictions would cause great hardship for the wild horses and would seriously impact their ability to survive on their range.	emc0020
7.	Additionally, as well as America's WH&B being restricted to a miniscule amount of Federal lands compared to livestock & other wildlife, they are also restricted within their HMAs by livestock fencing & cross-fencing. How on earth can they be "free-roaming" with these barriers which prevent them from access to adequate forage and water to "sustain a healthy population" across all seasons of the year? Note, a "healthy population" is way more than the horses just having good body weight and being disease free. It means:	emc0021
8.	Understanding that a large portion of the sanctuary boundary is not currently fenced and that additional cross-fences may be necessary to provide management control of the horses we are concerned about impacts to the wintering mule deer herds. Any fence that may be strong enough to control horse movements may impede a mule deer's ability to move and adapt to changing (site specific) climatic conditions during the deep snow winter months. As such, it is our recommendation that only wildlife friendly fences, of whatever materials, be considered.	emc0018
9.	The area in which to be fenced is already HMA & this proposed need to fence it is a complete waste of tax payer money & it would be cutting off the only water supply in the area to the other HMA's	emc0043

Table C-5.B
Comments Related to Fencing

Comment No.	Comment	Cmt Ltr Code
10.	Our Valley Mountain allotment joins the Spruce allotment on the South and West sides. Part of our common boundary is fenced and part of it is unfenced ridgelines and natural barriers which stop the drift of livestock-- but not wild horses. The entire East side of the Spruce allotment is bounded by the Goshute Mountain Range and is not fenced. Each year the horses on the range run through and tear up portions of the existing boundary fence. This requires us to repair the damaged places in order to contain our livestock. This proposed sanctuary is surrounded by public lands that have "wild, free-roaming" horses running on them.	rmc0005
11.	Question: What kind offence, and at what expense, does the BLM plan to build around the half million acre sanctuary that will contain sanctuary horses and keep horses from surrounding ranges out while not interfering with the movement of deer, elk, and other wildlife?	rmc0005
12.	An eco-sanctury is just dandy, but FENCING wild horses off from water & grazing?	emc0018
13.	The proposed sanctuary boundary should be placed outside the Goshute Peak and South Pequop Wilderness Study Area boundaries. As clearly documented in the BLM's Antelope Complex Gather Capture Plan and EA (November 2010, pages 77-85), feral horses have already severely impacted the few springs and seeps and their associated critical to wildlife riparian environments. The proposed feral horse sanctuary boundary fence should be built along the west foothills WSA boundary to exclude feral horses from continuing to damage and destroy the limited and precious water resources to preserve them for indigenous wildlife use. The fences built around the sanctuary boundary should be constructed in as wildlife "friendly" manner as possible to allow free passage through the feral horse sanctuary. Exclusion of feral horses from these two WSA's is crucial as the excessive trampling and compaction around springs and seeps, along with the numerous feral horse trails created by excessive numbers of feral horses, inhibit native vegetation growth and induce spring snowmelt and precipitation runoff resulting in erosion. This instead of water percolation into the ground to recharge ground water that provides the source of water for the few critical springs and seeps in the area. Even if feral horses are excluded from these areas it will take years, if not decades, for natural annual freezethaw action and solifluction processes to loosen the feral horse compacted soils and for natural slope angles to recover that will hopefully allow native vegetation and ground water levels to recover. If this action is taken, it is highly recommended that the BLM closely monitor the springs and seeps and their associated critical riparian environments during recovery to ensure invasive and noxious weeds do not overwhelm these precious resource areas. Wherever possible manmade water sources close to the sanctuary boundary should be modified to provide water for wildlife outside the sanctuary boundary to prevent aggressive feral horse behavior towards wildlife and to provide water for wildlife during times of drought or whenever required for the benefit indigenous wildlife species.	emc0034

Table C-5.B
Comments Related to Fencing

Comment No.	Comment	Cmt Ltr Code
14.	(2) This also implies the free movement of all species in and out of an area. With respect to the wild horses and burros, this means that their migratory routes from winter and summer areas, along with historic water sources are accessible, unrestricted by fencing. To continue, it also implies that the natural predators of the wild horses and burros are not fenced out, as with any eco-sanctuary, or ecosystem, these predators are also an intrinsic aspect of a, "thriving natural ecological balance".	emc0038
15.	As a thriving natural ecological balance is absolutely necessary to any ecosystem, including an eco-sanctuary, it is by necessity that a hands-off approach is required. The moment there is any attempt to alter an ecosystem in an artificial manner, assumes that this dynamic personality operating within an ecosystem or eco-sanctuary is going to behave as we determine it should. In essence, from that point on, it ceases to be natural and thriving, because those vital components, contained in the system, whether microbial, or otherwise are being altered, and the system begins to break down. This hands-off approach implies no manmade restrictions on the area, including fencing and any deterrent to the ability of the wild horse and burros to reproduce as nature would have it.	emc0038
16.	In addition they wouldn't be given the opportunity to interact with other species of animals, something required for any, "thriving natural ecological balance", to maintain the appropriate numbers of individual species within those areas, including those of the wild horses and burros, something restricted by fencing. Also, by virtue of the fencing, historical water sites and migratory routes, from summer and winter grazing areas, are cut off, further inhibiting the very concept of a, "thriving natural ecological balance".	emc0038
17.	Additionally, those adjacent public lands should NEVER be fenced, they should be populated with wild free roaming horses in functioning family bands and zero cattle to replicate the days before cattle were put out to destroy the biology and eco-diversity of our western landscape.	emc0041
18.	Issue #3: BLM requires us to pay for all new fence so should she.	emc0061
19.	This is to let you know that I strongly oppose the creation of the Eco-sanctuary in Northeast Nevada in its current form. I oppose the following among other things including the: Building fences around the eco-sanctuary using our tax dollars Cutting off wild equines and other wildlife from their historic ranges for forage and water	fxc0003
20.	(2) This also implies the free movement of all species in and out of an area. With respect to the wild horses and burros, this means that their migratory routes from winter and summer areas, along with historic water sources are accessible, unrestricted by fencing. To continue, it also implies that the natural predators of the wild horses and burros are not fenced out, as with any eco-sanctuary, or ecosystem, these predators are also an intrinsic aspect of a, "thriving natural ecological balance".	fxc0002

Table C-5.B
Comments Related to Fencing

Comment No.	Comment	Cmt Ltr Code
21.	(4) This brings a 4th aspect of this concept of an eco-sanctuary to our attention. As a thriving natural ecological balance is absolutely necessary to any ecosystem, including an eco-sanctuary, it is by necessity that a hands-off approach is required. The moment there is any attempt to alter an ecosystem in an artificial manner, assumes that this dynamic personality operating within an ecosystem or eco-sanctuary is going to behave as we determine it should. In essence, from that point on, it ceases to be natural and thriving, because those vital components, contained in the system, whether microbial, or otherwise are being altered, and the system begins to break down. This hands-off approach implies no manmade restrictions on the area, including fencing and any deterrent to the ability of the wild horse and burros to reproduce as nature would have it.	fxc0002
22.	In addition they wouldn't be given the opportunity to interact with other species of animals, something required for any, "thriving natural ecological balance", to maintain the appropriate numbers of individual species within those areas, including those of the wild horses and burros, something restricted by fencing. Also, by virtue of the fencing, historical water sites and migratory routes, from summer and winter grazing areas, are cut off, further inhibiting the very concept of a, "thriving natural ecological balance".	fxc0002
23.	(2) This also implies the free movement of all species in and out of an area. With respect to the wild horses and burros, this means that their migratory routes from winter and summer areas, along with historic water sources are accessible, unrestricted by fencing. To continue, it also implies that the natural predators of the wild horses and burros are not fenced out, as with any eco-sanctuary, or ecosystem, these predators are also an intrinsic aspect of a, "thriving natural ecological balance".	fxc0005
24.	(4) This brings a 4th aspect of this concept of an eco-sanctuary to our attention. As a thriving natural ecological balance is absolutely necessary to any ecosystem, including an eco-sanctuary, it is by necessity that a hands-off approach is required. The moment there is any attempt to alter an ecosystem in an artificial manner, assumes that this dynamic personality operating within an ecosystem or eco-sanctuary is going to behave as we determine it should. In essence, from that point on, it ceases to be natural and thriving, because those vital components, contained in the system, whether microbial, or otherwise are being altered, and the system begins to break down. This hands-off approach implies no manmade restrictions on the area, including fencing and any deterrent to the ability of the wild horse and burros to reproduce as nature would have it.	fxc0005
25.	In addition they wouldn't be given the opportunity to interact with other species of animals, something required for any, "thriving natural ecological balance", to maintain the appropriate numbers of individual species within those areas, including those of the wild horses and burros, something restricted by fencing. Also, by virtue of the fencing, historical water sites and migratory routes, from summer and winter grazing areas, are cut off, further inhibiting the very concept of a, "thriving natural ecological balance".	fxc0005

Table C-5.B
Comments Related to Fencing

Comment No.	Comment	Cmt Ltr Code
26.	This could and should be done without changing or reducing any of the HMAs, without adding any fencing and most importantly, without removing any of the Wild Horses or Burros from their Legal Herd Management Areas. A plan such as this would give the taxpaying American citizens something BENEFICIAL in return for their hard-earned tax dollars.	fxc0004
27.	Remove the wording regarding the fencing in of the Sanctuary please.	fla0013
28.	c. The document says that the permittee is responsible for fencing; maintaining fence requires constant vigilance. Horses are likely to test and at times destroy fences. Also fencing has to be wildlife friendly. How will BLM ensure that fences are maintained and if problems occur i.e. fences breakdown and permittee horses leave or feral horses enter, who is responsible for sorting horses and paying for the separation costs?	emc0082
29.	In reading over the well-written and interesting booklet on the proposed ecosanctuary, I was also very disturbed to learn of the proposal to erect fences all around the ecosanctuary and to thus condemn 93% of the Spruce/Pequop, 27% of the Goshute, and 14% of the Antelope Valley HMAs to becoming part of the non-reproducing herd of geldings. These fences would disrupt the natural movement patterns of the wild horses, causing them great stress and making it very hard for them to thrive, perhaps even survive. Maintaining the "free-roaming" natural life style is central to fulfilling the WFHBA, and nothing has changed in this regard in subsequent legislation, neither FLPMA nor PRIA.	emc0085
30.	8)The proposal says the fencing needs to be contiguous around the 508,000 acres in which part of it is not at this time. The public is to pay for the fencing as part of its taxes. The legality of this forced payment is questionable and needs to be addressed.	emc0089
31.	It is proposed to fence the entire allotment. I am familiar with the territory and know that this will create a huge expense and other problems. The terrain does not allow itself to easy fencing or maintenance. I would be interested to know how the fence will be constructed and with what goal. If it is to keep livestock out, then standard 4 wire legal Nevada fencing would suffice. If it is intended to keep horses in, the fence as proposed is inadequate. Wild horses are continually knocking over the current fences. A stronger, more expensive fence would need to be constructed to isolate the proposed SAM.	emc0090
32.	Fencing It is estimated approximately 53 to 72 miles of new fencing will be required to enclose the range and protect neighboring permittees from the federally owned wild horse herd. Established regulations require that any fencing must not impede the movement of wildlife in the area as well. Where will the funding for such improvements be derived and will this funding take precedence over existing applications within the district?	rmc0002

Table C-5.B
Comments Related to Fencing

Comment No.	Comment	Cmt Ltr Code
33.	The original idea of the Eco-Sanctuaries was to provide a savings to tax payers by reducing longterm holding costs. SAM stated that they are going to hold horses for a stipend which is less than the current cost to hold long term horses; still there is the issue of who will pay for the fences that are needed as well as forage and water improvements. If BLM pays for the fence then that cost must be added to the value of the stipend paid for holding the horses in order to reflect the true cost of the stipend to the public. The cost of the fence increases the amount that SAM is being paid per horse. Is this still a good deal for the public? In addition, as per the agreement between SAM and BLM, SAM has agreed to accept a stipend less than the cost per horse that is paid in long-term holding. If SAM undertakes the cost of the fence then the stipend, the price they are being paid per horse, is a true value.	emc0095
34.	This RAC encourages BLM to consider incorporating a bond, paid for by SAM, for fence removal that is being constructed which is specific for their use. There are so many unwanted and unused fences scattered across NV. which create difficulties in managing and gathering wild horses as well as difficulties in managing wildlife, recreation and other uses. For example, if a mining company applies for a permit from BLM, BLM requires that they put up a substantial bond in order to restore the land should the mining company fail. Should SAM not succeed , is there money set aside to return the land to its original state, to reseed should the land be overgrazed and not maintained, to remove fence, and/or make improvements as needed to return to the land to healthy condition?	emc0095
35.	A properly managed herd in the wild needs no fences to delineate boundaries. We are bound by Congress to have drawn lines on our maps around where we knew in 1971 that wild horses roamed. Altering their established routes and territories by extensive fencing is against the intent of the Act. Just the presence of extensive fencing increases management costs dramatically. Fences in our American West were begun to separate private livestock from other private livestock. If we were paying attention in 1971, extensive fencing is not now needed for horses.	emc0097
36.	In the public "scoping" meetings, BLM presented alternatives that didn't really provide much of a choice since all possible "alternatives" offered by BLM included these unacceptable conditions: 2) fencing of the entire perimeter of the sanctuary, which: a) would seriously impede wild horse free-roaming behavior; b) would barricade horses outside the sanctuary from traditional water sources and from traditional migratory routes; c) in one case may even create a poor-weather death trap because of the topography on the Goshute side of the sanctuary.	emc0107
37.	In contrast, fencing the SAM sanctuary and removing mares as BLM intends violates the multiple use mandate because it deprives the main stakeholder --the wild horse population of over 1500 animals-- of their historic, documented use of these HMAs.	emc0107

Table C-5.B
Comments Related to Fencing

Comment No.	Comment	Cmt Ltr Code
38.	The Proposed Plan is a completely new project and way to manage wild horses. The uncertainty of the how the horses will respond to being managed is not clear and there is no evidence to support the Proposed Plan being a success. Within the Proposed Plan, fencing alternatives have been defined. As the horses to be managed on Spruce Allotment will still be federally owned, we question how the BLM is abiding by the Wild and Free-Roaming Wild Horse and Burro Act of 1971 by suggesting more fencing be developed to manage the horses. The proposed fencing alternatives also do not clearly define how fencing correlates with wildlife corridors and essential habitat.	emc0110
39.	?Eco? Suggests natural balance. There is nothing natural OR balanced about sterilized equine herds inhabiting fenced and artificially created habitat.	emc0111
40.	Fencing this behemoth area is another attempt to restrict public access to our public lands.	emc0111
41.	I do not support any plans that involve fencing off the proposed 550,00 acres of land from the wild horses or rounding up the existing horses found in the subject HMAs.	emc0112
42.	In reading over the proposed eco-sanctuary information that is accessible, I am very disturbed to learn of the proposal to erect fences all around the eco-sanctuary and to thus condemn 93% of the Spruce/Pequop, 27% of the Goshute, and 14% of the Antelope Valley HMAs to becoming part of the non-reproducing herd of geldings. These fences would disrupt the natural movement patterns of the wild horses, causing them intense stress and making it very hard for them to thrive and likely even survive. Maintaining the "free-roaming" natural life style is central to fulfilling the WFHBA, and nothing has changed in this regard in subsequent legislation, neither FLPMA nor PRIA.	emc0114
43.	The fencing proposed will cut off wild horses - who ordinarily migrate across the now unfenced boundary -- from water.	emc0114
44.	Beyond the implied requirement of fencing to encompass the boundaries of the proposed ecosanctuary, we believe it is necessary for the Draft EIS to address what consequences will follow if and when wild horses escape from the boundaries of the eco-sanctuary. Likewise, in the event that wild horses continue to populate portions of the adjacent HMAs outside the proposed ecosanctuary, we believe it is necessary for appropriate clarification for the potential results of these "outside" wild horses getting into the project area and mixing with the "inside" wild horses. It has been called to our attention that use of legal fences, as spelled out by Nevada State Law, are not demonstrated to be effective deterrents to holding wild horses either in or out of areas where they are not intended to be allowed. In addition to stipulating the nature of the fencing for boundaries, we anticipate the Draft EIS will cover the consequences and ramifications of wild horses exiting or entering the proposed project area.	emc0083

Table C-5.B
Comments Related to Fencing

Comment No.	Comment	Cmt Ltr Code
45.	1. The legal sanctuary for wild horses and burros is the HMA. The HMA, under law, is to manage a wild population capable of "free-roaming behavior" and the definition of a wild population is one that can "reproduce itself." This proposal (alternatives presented) violates that aspect of law by: b. obstructing free-roaming behavior by the installation of a significant fence	emc0083
46.	5. BLM should release details of the plan of operation that will address issues of open gates attributable to recreationists and malicious behavior.	rmc0009
47.	12. BLM should evaluate where fences would need to be constructed, given that some of the boundaries are within a Wilderness Study Areas which prevents fences from being constructed. This type of expense must be incorporated into the cost savings analysis.	rmc0009

Table C-6
Comments Related to Livestock Grazing

Comment No.	Comment	Cmt Ltr Code
1.	AMLs options for current livestock on the public domain can be managed on private property since most ranchers raise their own hay. When livestock occupation on the public domain conflicts/competes with habitat which is necessary and imperative for the survival of equis wildlife, the RMP must devote habitat principally to the wild horses or burro herds. Otherwise.. The Resource Management plan is fatally flawed.	emc0003
2.	We are concerned that horses will be removed from lands outside the fence, and the forage and other resources that are allocated to the horses will be handed over to sheep and cattle ranchers whose herds are degrading the lands and waters. If that occurs, very important pygmy rabbit, migratory bird, raptor and other wildlife habitats, across this landscape will suffer intensified disturbance - as the AMLs did not fairly balance uses based on differences in use of food, cover, and space.	emc0006
3.	Please provide full information and analysis of any current rangeland health or other studies that have been conducted in the past decade across all lands affected by this proposal and the affected allotments and HMAs.	emc0006
4.	BLM must consider alternatives that significantly reduce livestock numbers in lands where there is talk of removing wild horses. The full Footprint of livestock in competing with wildlife and horses for food, water and space must be assessed. What has been the livestock actual use by pasture and by allotment for the past 20 years for all affected lands? Please provide all monitoring data as well, and the locations of this data.	emc0006
5.	For lands both in and outside the sanctuary proposal: How has BLM determined what use is occurring due to horses, and what use and impacts were (or are) due to livestock? In uplands? Riparian areas? Are there separate horse vs. livestock monitoring sites? If so, where are all sites - both livestock and horse use? We are concerned because typically NV BLM cherry-picks sites to show minimal livestock use, and maximal horse use, even though the animals use the landscape quite differently. Where has nay current carrying capacity, capability or other study been conducted? What are the findings?	emc0006
6.	I am very concerned, and angry, that the greater portions of the forage in the affected HMAs of Goshute, Dolly Varden and Antelope will be given to livestock. This is, as you are very well aware in direct contradiction to the Wild Free-Roaming Horses and Burros Act of 1971 which plainly states that the resources of the herd areas or territories where they were found in 1971 should be "devoted principally" to the wild horses or burros. This is not happening as the BLM well knows.	emc0007
7.	I would also point out that I protest the very low and non-viable AMLs that have been decided for the three of the HMAs which will be affected by Ms. Pickens ecosanctuary. Livestock AUMs should be reduced in these areas and the wild horses and burros should be given the principal allocation of forage, which should be over 50%.	emc0007
8.	I think the public's wild horses have been over managed for several years in favor of special interest. The cattle that are on public lands have degraded as much public land if not more than the horses have.	emc0013
9.	It is particularly galling that livestock arbitrarily authorized by the agency to graze in HMAs on our publilands significantly outnumber wild horses by 150-1 and are far more destructive to the environment than wild equines who actually benefit the ecosystem. -- If the BLM would deign to provide a detailed breakdown of range data, including GENUINE data that	emc0020

Table C-6
Comments Related to Livestock Grazing

Comment No.	Comment	Cmt Ltr Code
	would TRUTHFULLY examine the difference of impacts between destructive livestock vs. beneficial wild horses, they would discover who the real culprit for land degradation really is. The returned NATIVE wild horses, whose ancestors roamed these lands for thousands of years, are often scapegoated by the BLM as the reason for range degradation although it is common knowledge that destruction of the environment is caused by an overpopulation of EXOTIC cattle. Wild equines enhance riparian areas and the ecosystem - cattle simply destroy the land and pollute the water. Yet there never seems to be any inclination on the part of the BLM to drastically reduce, or preferably eliminate, destructive livestock -- only our rapidly vanishing federally protected wild equine herds. How can the agency justify annihilating entire herds to make room for even more cattle -- or other "special" uses (mining, oil and gas drilling and water industries) -- at the expense of a federally protected species? BLM has a statutory mandate to protect wild horses -- NOT CATTLE! It is also not their job to pacify livestock, hunting and extractive industries by systematically wiping out our wild herds.	
10.	Wild horse areas that have been illegally stolen must be restored and AMLs must be significantly increased to ensure genetic viability while at the same time livestock in wild horse areas must be eliminated or GREATLY reduced in order to allocate a FAIR SHARE of public lands and resources to our wild herds. Extraction industries must also not be given preference over wild horses whose lawfully designated areas are to be managed PRINCIPALLY for THEIR use. This would be a good start in giving back to the wild horses what is rightfully THEIRS by law.	emc0020
11.	<p>Agency Mandate to Support Food Production Ignored</p> <p>One of the original constituent agencies of the BLM was the U.S. Grazing Service. Though multiple use is now their charge, without diligent review of all options food production should never be diminished either by omission or commission of agency action. To date in this matter that review apparently has not been done.</p> <p>The conversion of the Spruce Mountain allotment from cattle to feral horses will remove range from active production. This can be viewed in terms of the direct loss of food, and also in terms of the commercial value of that food. The relation to general economic activity will be discussed as it may be more common for most of us to think in monetary rather than food production terms. Essentially, with so few of the population involved in agriculture, it makes sense to present that production in financial terms in this document which is intended for a general audience.</p>	emc0030
12.	This is a transparent sham on behalf of profiteers (probably foreign, too) to reserve EVERY SINGLE BLADE OF GRASS FOR COWS. These lands are public--god damn the cattlemen's profit, and god damn the cattlemen with it. I eat beef, horses have been on those lands for a few centuries at least, ply me not with dire threats of beef costs rising. This isn't about costs rising, this is unbridled greed for more profit. And you fine people of the BLM are their puppets on a string	emc0022
13.	They eat less and drink less than all the stupid cattle that the ranchers raise. Become vegetarians and leave the animal kingdom alone. You won't have to worry about not enough space on the land then. And the amount of cattle that are being	emc0027

Table C-6
Comments Related to Livestock Grazing

Comment No.	Comment	Cmt Ltr Code
	raised will dramatically decrease	
14.	The analysis should include evaluation of the suitability of the 1990's carrying capacity given the diminishing range conditions and poor water availability observed in the last years of the previous livestock permit while also clearly describing the process and rationale in any AUM conversion.	emc0018
15.	The document should clearly depict the management techniques that will be applied to manage the horse distribution and duration to maintain rangeland health standards and utilize the vegetation resources that will be in competition with big game species. Included should be a prescribed grazing plan and schedule with clearly identified triggers and monitoring protocol to ensure rangeland health and compliance with the established Standards and Guidelines.	emc0018
16.	Using BLM data, the allotment will sustain 909 cattle, and perhaps no more than 505 horses. Some ranchers maintain it cannot sustain that many horses. Using these numbers, with a \$1,000 value for cattle requiring three years to raise to market, the annual economic value produced on the allotment is \$303,000. From this the rancher pays the agency nearly \$15,000 per year in grazing fees. Additionally, sales taxes approaching \$21,000 are paid to the state and county.	emc0030
17.	SAM proposes they receive \$500 per feral head in order to manage the herd. That comes to a direct taxpayer cost of \$253,000. As noted above, the proposal declares there will be ecotourism activities, but does not discuss the costs which will be deducted and carried by the taxpayer. A dude ranch for beautiful people to view feral show-horses may well approach costs which overwhelm the annual quarter of a million to maintain the herd. SAM proposes to pay the County approximately \$10,000 for the retirement of the grazing fees in order to compensate for the loss of food production. Since that amount also can be deducted from SAM's taxes, it really remains a taxpayer liability but is mentioned here as indicative of the deceit involved in the venture.	emc0030
18.	Removing the \$303,000 value of the cattle from the economy, coupled with the direct burden of nearly \$253,000, results in a total direct annual financial burden of \$556,000. Since these are before the majority of tax deductions for operating this charity, the impending cost to the taxpayer is substantial indeed.	emc0030
19.	Further to that cost is the prudent consideration of wealth recirculation due to agricultural production. Each dollar of created wealth can reasonably be expected to turn over or multiply five times in the local and larger economy. That is, the initial value of the cattle will go into wages and general commerce which would not have occurred without the creation of that wealth. The economic functions of creating value where it did not exist or adding value to something existing are the essence of growth and vibrancy. These enlarge the pie. Simply transferring wealth does not generate growth since at best there is only a balance between the source and the destination. The pie is no larger, just redistributed.	emc0030

Table C-6
Comments Related to Livestock Grazing

Comment No.	Comment	Cmt Ltr Code
20.	Again, SAM has graciously offered to pay Elko County \$10,000 per year for eliminating grazing rights. What SAM should be required to pay annually will be no less than \$556,000. When the full deductions for the feral ranch operation are considered, those required payments may reasonably range well beyond \$1,800,000.	emc0030
21.	<p>Taking Requires Making Whole</p> <p>In this case of replacement of a private business with a government-selected business, retirement of grazing rights essentially is a taking from the private businesses which held those grazing rights. Further to that, the federal government and the enviro-glitteratti must be subject to equal treatment under the law. Those takers must make the ranchers whole for the loss of livelihood.</p> <p>They also must make the County and State whole for their loss of economic value from food production on the land. As noted above, this making whole to Elko County and/or the State cannot be done as transfer payments from any State and/or Federal agency. Transfer payments simply move money among the taxpayer's pockets and do not truly recover the societal economic loss. The making whole must continue until the land is restored to agricultural production. The federal government does not own the land and has no right to take it out of production. The land is owned by the State of Nevada and the people, and removing it from production brings material harm to the State and the people.</p>	emc0030
22.	<p>Conclusion</p> <p>Fundamentally, cattle raising is economically productive and vibrant. The proposed fencing in and sterilizing of feral horses will render them sorrowfully listless. The proposal requires productive citizens to forfeit a portion of or their entire livelihood in order allow SAM to concentrate and sterilize the feral horses, thereby committing a heinous atrocity all in the name of SAM's misdirected eco-tistical guilt. The BLM will support this annual negative economic impact because the agency sees a virtual transfer of additional funds to their control. In reality, the eco-sanctuary proposal is societal loss of food production with the end result of sterile, captive formerly feral show-horses. As an absolute minimum, SAM must pay the annual \$556,000 to \$1,800,000 to Elko County and the ranchers who have been and will continue to be harmed by SAM's taking of that amount of economic productivity.</p>	emc0030
23.	<p>do the following;</p> <ol style="list-style-type: none"> 1. change Ms. Pickens livestock class from cattle or sheep to horses. 2. sell her horses from the BLM pens to fill her permit. 3. charge her the grazing fee, the same as any other livestock owner 	emc0053
24.	The Spruce Mountain allotment has a long history of annually converting a naturally occurring renewable resource into \$500,000 to \$800,000 of new wealth in the form of high quality lamb and beef which add to the national food supply and to the local and national economy.	rmc0005

Table C-6
Comments Related to Livestock Grazing

Comment No.	Comment	Cmt Ltr Code
25.	I therefore make the following suggestions and recommendations concerning the proposed feral horse sanctuary: Due to the biological differences in digestion efficiencies between cattle and horse, with horses being less efficient single stomach digestion, and the fact that horses will be permitted to graze year-round which results in potentially limited forage reproduction, as well as less efficient and flexible management than cattle grazing, the cattle AUM to horse AUM conversion should be 1:1.8, or at a maximum 1:1.5. This means that if the Proposed Northeast Nevada Feral Horse Sanctuary is approved the total number of horses permitted on the public rangelands should be set at around 500 head and absolutely no more than 600 to prevent degradation of the public lands.	emc0034
26.	(3) This implies also that other species of grazers have free movement in and out of the area, unrestricted by fencing, as these also play a key part in what has been described above as, density dependant inhibition. What this means is that the numbers, or density, of another species of grazer helps to regulate the numbers of wild horses and burros, and vice versa, again helping to determine, without human intervention, the appropriate number of individual species of grazers within the area. This is exactly what occurs in the individual HMAs, or what should be allowed to occur in the individual HMAs, without human intervention.	emc0038
27.	What you should do is convert the cattle AUMs to horse AUMs and quite trying to sterilize every equine in sight, CELEBRATE the families of wild horses living wild on the land instead!	emc0041
28.	Issue #2: Conversion Rate, We were always required to convert 2 cattle AUM's to receive 1 horse AUM on our permit.	emc0061
29.	(3) This implies also that other species of grazers have free movement In and out of the area, unrestricted by fencing, as these also play a key part in what has been described above as, density dependant inhibition. What this means is that the numbers, or density, of another species of grazer helps to regulate the numbers of wild horses and burros, and vice versa, again helping to determine, without human Intervention, the appropriate number of Individual species of grazers within the area. This is exactly what occurs In the individual HMAs, or what should be allowed to occur in the individual HMAs, without human intervention.	fxc0002
30.	(3) This implies also that other species of grazers have free movement In and out of the area, unrestricted by fencing, as these also play a key part in what has been described above as, density dependant inhibition. What this means is that the numbers, or density, of another species of grazer helps to regulate the numbers of wild horses and burros, and vice versa, again helping to determine, without human Intervention, the appropriate number of Individual species of grazers within the area. This is exactly what occurs In the individual HMAs, or what should be allowed to occur in the individual HMAs, without human intervention.	fxc0005
31.	I strongly oppose use of the public lands of the Spruce Allotment to be used for wild horses.	emc0076
32.	(2) reduce and potentially eliminate livestock grazing within the portion of the Spruce Allotment east of Highway 93.	emc0055

Table C-6
Comments Related to Livestock Grazing

Comment No.	Comment	Cmt Ltr Code
33.	Plus why does BLM pander to cattle? Why the reduced grazing rights on public land? And cattle ranchers have all this say? Public lands--I have a say.	fla0016
34.	We American citizens know that it is the cattle the deficate in waters and lay in water hole areas not the wild horses. It is the over abundance of cattle grazing on the land that you have allowed that has created the problems on the land - not the wild horses.	fla0044
35.	Because the grazing permits are a form of welfare to the cattle industry and ranchers I strongly support an increase in permit fees to them to help support these efforts.	fla0054
36.	Additionally, I DO NOT SUPPORT LIVESTOCK GRAZING ON OUR HML's, and call for their TOTAL REMOVAL FROM THESE, OUR LANDS. MOVE THE CATTLE OUT, AND LET 'EM BUCK!	fla0060
37.	Get the cattle off of the wild horses lands and stop neutering horses.	fla0078
38.	Considering the Bureau of Land Management's recent efforts to ensure the eradication of wild mustangs from publicly owned range lands, I feel it is of paramount importance to ensure that there is an eco-sanctuary from which they can not be removed. The cattle industry has pushed and the BLM has gone with them on the removal of mustangs from most of their herd management areas on public lands to the point that the remaining mustangs are too few to be genetically sustainable over the long term. This MUST cease and a sanctuary must be provided in which wild mustangs may thrive.	fla0084
39.	In the opinion of many, cattle are at the root of overgrazing in most parts of this country, and on public land to boot!	fla0113
40.	Destroying native animals that were born in that area to replace them with cattle is totally ridiculous and I hope that you understand how vehemently the American public is against it. If the big cattle ranchers have enough money to buy government support, let them buy their own private property for their stinking, destructive cattle.	fla0115
41.	I was unaware of the scoping document or the scoping meetings until yesterday. The transfer of grazing from cattle to horses offers intriguing issues to address in the EIS: a. Will BLM assess rangeland health on the allotment and be capable of reducing grazing use before contracting with a new permittee? Is BLM willing to eliminate cow/horse use where damage is occurring? While the new owner may have purchased grazing permits and regards the permits as real property, BLM is not required to view grazing as a property right but rather as a privilege. Because horse grazing will, as the scoping document indicates, have a potentially greater impact, a cautionary note is advisable.	emc0082
42.	Will BLM charge for grazing use or will the fee charged by the grazing permittee be eliminated? After all, BLM still has monitoring and oversight responsibilities which must be paid for....out of the horse account, range account? A percentage of fees collected go to Grazing Boards which use some of the fees for range improvements.	emc0082

Table C-6
Comments Related to Livestock Grazing

Comment No.	Comment	Cmt Ltr Code
43.	This should be the first opportunity to incorporate into a grazing permit, the concept of climate change and adjustments made in grazing use accordingly. I expect an entire section on the history of climate and plants and new ways of modifying grazing use if needed	emc0082
44.	While we fully recognize the need to address the problem of wild horse overpopulation on the range and the insupportable cost of keeping some 40,000 horses in holding pens, we do not believe SAM's proposal is the solution. Below are just a few of the concerns we believe should be considered when looking at alternatives: <input type="checkbox"/> We oppose any alternative that would convert public lands livestock allotments (which encompass portions of the proposed sanctuary boundaries) to an HMA or wild horse sanctuary.	emc0084
45.	While we are not opposed to individuals entering into private agreements with the federal government to establish areas on private property where excess wild horses and burros can be held, violating the Taylor Grazing Act of 1934 (TGA) by converting federal livestock allotments to wild horse sanctuaries would jeopardize our members' grazing permits, presenting opportunities for anti-grazing interests to push for more conversion of livestock allotments to other uses. Industry will closely follow development of alternatives by the BLM to ensure any final actions are completely consistent with TGA and other statutes which protect our members' rights to graze livestock on federal lands.	emc0084
46.	<input type="checkbox"/> The ranch purchased by Mrs. Pickens possesses three HMAs. One is fully encompassed by the boundary of the allotment; the other two straddle the boundary. Because statute discourages fencing of HMAs or portions of HMAs, we question how sanctuary horses will be prevented from grazing on adjacent ranchers' allotments. Also inevitable would be the comingling of sterile sanctuary horses and the adjacent HMA's horses, which is not authorized by the H&B Act.	emc0084
47.	Will this project become a prototype to mitigate the overpopulation of HMA's by removing cattle grazing permits?	emc0086
48.	6. Range conditions: What are the current range conditions in the Spruce Allotment? This information should become the baseline conditions against which the success or failure of meeting management requirements can be evaluated. This allotment is well-known as not being in good condition because of the historic sheep use and decades of livestock overgrazing. It is in serious need of ecological restoration. How will 900 wild horses be managed to contribute to restoration and not to continuing degradation of public rangelands?	emc0087
49.	I have read the literature concerning the conversion from livestock to horse AUM's. I have fed both horses and cattle and am sure that a conversion of 1 horse to 1.2 cows is unacceptable. In my experience feeding both species through the winter months on controlled rations the conversion should be closer to 1:1.8 if not more. Please provide more science than a comparison to a resource in another state that does not have equal forage qualities or quantities.	emc0090
50.	The removal of 525,000 acres and 13,423 producing AUMs from the grazing district, will be a significant loss of revenue and production to Elko County.	rmc0002

Table C-6
Comments Related to Livestock Grazing

Comment No.	Comment	Cmt Ltr Code
51.	This range historically produced an economically sustainable sheep and cattle operation contributing to the economy on the local, state and national level. Also, it is our belief that the retirement of this permit for non-agricultural use is forbidden under the Taylor Grazing act.	rmc0002
52.	The proposal requires that 10,908 active AUM's and 2,458 suspended AUM's from the Spruce allotment to be retired to accommodate the EcoSanctuary. This represents a loss of revenue to the BLM as well as the local government. The retirement of the AUM's currently allocated for cattle use represents the loss of a viable operation that contributed to the local economy in exchange for the operation of a non-profit corporation (SAM) that will not be required to pay any tax revenue or contribute to the local or regional economy.	rmc0003
53.	When considering what is fair for the tax payers, the local agencies must also be considered. Though SAM has agreed to pay the 1/3 of the grazing fees to the state grazing board, the area is being removed from the N-I grazing district. This is a contradiction in the proposal that needs to be addressed and/or clarified. This RAC suggests that BLM consider a lease of 5 years at a time with renewable options to SAM, thus if SAM the land could be added back to the N-I grazing district should there be a need to do so in the future.	emc0095
54.	Do you really think we aren't watching or know that you are doing everything in your power to make sure the mustangs in the wild are driven to extinction? You are supposed to protect them - NOT sell them out with lame excuses like 'not enough grass or water' when there apparently is plenty for the cattle - the cattle which are NOT native wildlife! !	emc0104
55.	<p>The Association's understanding of the Proposed Plan is to use the Saving America's Mustangs (SAMs) private property as headquarters for an ecotourism business to be held mainly on public land using public wild horses, and, in turn, SAM organization will receive compensation for management of these public wild horses. While this plan may be good in theory, the economic value of an ecotourism business is subject to question and is not supported by any factual measurements. Secondly, the request of the SAM organization to be compensated for managing public horses at any cost does not support the economy. Essentially, the Proposed Plan will cost a taxpayer more to manage horses and remove agricultural production from this portion of public lands. The Association suggests the Bureau of Land Management (BLM) consider entering an agreement with SAM only if the Proposed Plan is revised to manage wild horses on private land, therefore, benefiting the taxpayer.</p> <p>While the economic value of ecotourism and the Proposed Plan can't be measured, the economic value of agricultural production being removed from this portion of public land can be measured. The ranch now owned by SAM, historically produced an economically sustainable sheep and cattle operation supporting both the local, state and national economy, in the form of reoccurring lamb and beef into the food supply and general cash flow within the community. Because of this particular concern, and others to follow in the future, the Association strongly suggests the any portion of land to be used for the Proposed Plan not be removed from the N-I Grazing District and the grazing permits not be retired.</p>	emc0110

Table C-6
Comments Related to Livestock Grazing

Comment No.	Comment	Cmt Ltr Code
56.	How is this allotment going to be removed from N-I Grazing District and what regulatory or legislative authority does BLM comply by to do so?	emc0110
57.	Ecological condition of the rangelands Ranchers and cattle operations on public lands use grazing systems to manage livestock. With systems such as rest rotation, deferred grazing, dormant season use, and herding, rangeland health goals can be achieved. With utilization records and proper management the health of the land is positively impacted. Ranches work under set standards and guidelines and an allotment management plan. The Proposed Plan currently does not follow these same guidelines yet the SAM Organization will be managing a grazing animal. The Association suggests the SAM Organization be held to the same standard as a rancher managing grazing livestock.	emc0110
58.	According to the internal notes from BLM Implementation Team meetings in 2008, obtained through the Freedom of Information Act and included at Attachment 6, precedent exists for the conversion of cattle Animal Unit Months (AUMs) to wild horse AUMs. In fact, the notes indicate that the late Richard Sewing of the National Mustang and Burro Association, utilized his grazing allotment for the maintenance of horses that he had adopted from the BLM program. There is no evidence to indicate that wild horses consume more forage or cause more environmental damage than cattle, as alleged in the Scoping Project Brief. In fact, BLM consistently understates forage usage by livestock, as documented by range specialist Dr. John Carter in the attached report: "BLM is understating forage consumption by cow/calfpairs by a nominal 50% based on the average body condition and frame scores. The implication of this on stocking rates is obvious. Based on forage consumption alone, not considering proper utilization, forage capacity and capability factors, BLM is over stocking allotments 33% based on failure to take into account current cattle weights and calves." (See the Attachment 8, report by Dr. Carter also available online http://projects.ecr.gov/tushar/pdf/Carter_AUM_paper.pdf In addition, the BLM itself has noted that wild horses have fewer effects on riparian areas because they tend to come to these areas to drink and then leave, whereas cattle are known to wallow in and around water sources. The most recent citation from a BLM document can be found in the Black Mountain and Hardtrigger wild horse roundup EA which states, "Wild Horse bands tend to be mobile relative to domestic livestock. They do not tend to loiter in riparian areas or around range improvements such as troughs and salting sites." (see PDF-page 19 At https://www.blm.gov/epl-front-office/projects/nepa/22203/38764/40668/DOI-BLM-ID-B030-2012-0010_Wildhorse_Prelim_EA_Final.Pdf) These factors must be considered by the BLM when converting cattle AUMs to wild horses.	fxc0001
59.	"Removing and Retiring Portions of the Spruce Grazing Allotment from NI Grazing District" In development and publishing of the Draft EIS for the Proposed Northeast Nevada Wild Horse Eco-Sanctuary, we	emc0083

Table C-6
Comments Related to Livestock Grazing

Comment No.	Comment	Cmt Ltr Code
	maintain that appropriate documentation be provided as part of the Draft EIS, which details the legislative and regulatory authorization used to complete this action as well as the legal process followed in canying out the amendment for the Wells Resource Management Plan which results in "removing arid retiring the portion of the Spruce Grazing Allotment east of U.S. Highway 93 from the NI grazing district. ". The process of removing and retiring a grazing allotment is complex and any proposal must clearly spell out how the proposal will comply with existing regulatory mandates.	
60.	<p>In an April 9, 2012 comment letter, Nevada Farm Bureau shared input comments for the Environmental Assessment (EA) process for the Snow Water Lake and Warm Creek Allotments which included related matters to areas interconnected with the private holdings either included in the Proposed Northeast Nevada Wild Horse Eco-Sanctuary or possibly adjacent to this proposed project. We have only recently learned of the No Significant Impact decision of this EA but were not informed of the results regarding whether the change of livestock use would include conversion of cattle AUMs to horse AUMs. We were also not made aware of the interrelationship for the actions proposed with this EA and the Proposed Northeast Nevada Wild Horse Eco-Sanctuary.</p> <p>If the contemplated activities of converting the cattle AUMs to horse AUMs for the Snow Water Lake and Warm Creek Allotments are still in a process of consideration or implementation, we believe that the Draft EIS needs to provide context for this proposal and the Proposed Northeast Nevada Wild Horse Eco-Sanctuary. We also maintain the need for an explanation and evaluation for whatever accumulative elements are involved.</p> <p>The Snow Water Lake and Warm Creek Allotment EA applied a ratio of 1:1.2 conversion, proposing to provide a specific management plan which allowed for a total of 200 horses. We are not aware of any background data that would substantiate this as an appropriate ratio for conversion.</p> <p>Allocation of forage within the context of the Proposed Northeast Nevada Wild Horse Eco-Sanctuary requires a more complete and detailed analysis of whatever ratio is considered as well as detailed evaluation of range conditions for the federally-managed lands in this area to determine the capacity to provide for whatever level of grazing is authorized, while still meeting rangeland standard objectives.</p>	emc0083

Table 7.A
Comments Related to Vegetation, Including Riparian and Wetland Areas and Noxious Weeds

Comment No.	Comment	Cmt Ltr Code
1.	The document should clearly depict the management techniques that will be applied to manage the horse distribution and duration to maintain rangeland health standards and utilize the vegetation resources that will be in competition with big game species. Included should be a prescribed grazing plan and schedule with clearly identified triggers and monitoring protocol to ensure rangeland health and compliance with the established Standards and Guidelines.	emc0018
2.	5. There are several springs in the area. BLM should monitor the springs on public land and ensure your decisions do not negatively impact the quality of springs, spring water and spring habitat on private lands.	emc0032
3.	5. There are several springs in the Dolly Varden Mountains area and water is a critical resource. BLM should monitor the springs on public lands and ensure that your decisions regarding the Eco-Sanctuary do not negatively impact the quality of springs, spring water and spring habitat.	emc0033
4.	Will the permittee be expected to reduce and eliminate weeds on her grazing allotments? Or, invest in restoration projects?	emc0082
5.	Similar to domestic livestock grazing, horses and burros may contribute to the spread of annual grasses (e.g., Bromus tectorum), which fuels unnatural fire in sagebrush steppe and irrevocably alters huge swaths of sagebrush habitat (see "Livestock Grazing Effects on Sage-Grouse and Sagebrush Steppe," attached). The Bureau of Land Management must analyze the contributions of horses and burros to the spread of invasive species.	emc0088
6.	Has an updated forage analysis of the Spruce Allotment been completed?	emc0110
7.	<p>According to the internal notes from BLM Implementation Team meetings in 2008, obtained through the Freedom of Information Act and included at Attachment 6, precedent exists for the conversion of cattle Animal Unit Months (AUMs) to wild horse AUMs. In fact, the notes indicate that the late Richard Sewing of the National Mustang and Burro Association, utilized his grazing allotment for the maintenance of horses that he had adopted from the BLM program.</p> <p>There is no evidence to indicate that wild horses consume more forage or cause more environmental damage than cattle, as alleged in the Scoping Project Brief. In fact, BLM consistently understates forage usage by livestock, as documented by range specialist Dr. John Carter in the attached report: "BLM is understating forage consumption by cow/calfpairs by a nominal 50% based on the average body condition and frame scores. The implication of this on stocking rates is obvious. Based on forage consumption alone, not considering proper utilization, forage capacity and capability factors, BLM is over stocking allotments 33% based on failure to take into account current cattle weights and calves." (See the Attachment 8, report by Dr. Carter also available online http://projects.ecr.gov/tushar/pdf/Carter_AUM_paper.pdf)</p> <p>In addition, the BLM itself has noted that wild horses have fewer effects on riparian areas because they tend to come to these areas to drink and then leave, whereas cattle are known to wallow in and around water sources. The most recent citation from a BLM document can be found in the Black Mountain and Hardtrigger wild horse roundup EA which states, "Wild Horse bands tend to be mobile relative to domestic livestock. They do not tend to loiter in riparian areas or around</p>	fxc0001

Table 7.A
Comments Related to Vegetation, Including Riparian and Wetland Areas and Noxious Weeds

Comment No.	Comment	Cmt Ltr Code
	<p>range improvements such as troughs and salting sites." (see PDF-page 19 at https://www.blm.gov/epl-front-office/projects/nepa/22203/38764/40668/DOI-BLM-ID-B030-2012-0010_Wildhorse_Prelim_EA_Final.pdf)</p> <p>These factors must be considered by the BLM when converting cattle AUMs to wild horses.</p>	
8.	<p>During recent years things have gotten out of hand, however. No longer are the needs and experiences of those living close to the land considered. Wild horses have been allowed to multiply far beyond the carrying capacity of the range. Grasses have been grubbed out. Springs have been annihilated. White sage flats have been trampled and beaten - to a point that some white sage flats have very few white sage plants growing on them any longer. Everything has suffered; deer, antelope, elk, horses, sage grouse, song birds - everything. So many horses were being run on the range, even when the Sorensen family took non-use over much of the area, the range continued to deteriorate.</p> <p>Those who are skeptical, need only look at the Antelope Complex Capture Plan And Environmental Assessment, which was released in September of 2010, for confirmation. Watering areas have been denuded, at times up to one hundred yards from seeps and springs. Hillsides trampled and beaten into trails, to a point that areas close to water often look as if they are spider webbed. White sage flats grazed to the ground.</p> <p>Without doubt, the Spruce-Pequop, Goshute and Antelope Valley area is the most abused and degraded area to be found anywhere within the Great Basin. It is no wonder that the Sorensen family was forced to sale. No ranching family could have survived the kind of adversity that was put upon the Sorensens' during recent decades.</p>	rmc0010

Table C-7.B
Comments Related to Rangeland Health Effects of Wild Horses

Comment No.	Comment	Cmt Ltr Code
1.	Please provide full information and analysis of any current rangeland health or other studies that have been conducted in the past decade across all lands affected by this proposal and the affected allotments and HMAs.	emc0006
2.	For lands both in and outside the sanctuary proposal: How has BLM determined what use is occurring due to horses, and what use and impacts were (or are) due to livestock? In uplands? Riparian areas? Are there separate horse vs. livestock monitoring sites? If so, where are all sites - both livestock and horse use? We are concerned because typically NV BLM cherry-picks sites to show minimal livestock use, and maximal horse use, even though the animals use the landscape quite differently. Where has any current carrying capacity, capability or other study been conducted? What are the findings?	emc0006
3.	I therefore make the following suggestions and recommendations concerning the proposed feral horse sanctuary: Due to the biological differences in digestion efficiencies between cattle and horse, with horses being less efficient single stomach digestion, and the fact that horses will be permitted to graze year-round which results in potentially limited forage reproduction, as well as less efficient and flexible management than cattle grazing, the cattle AUM to horse AUM conversion should be 1:1.8, or at a maximum 1:1.5. This means that if the Proposed Northeast Nevada Feral Horse Sanctuary is approved the total number of horses permitted on the public rangelands should be set at around 500 head and absolutely no more than 600 to prevent degradation of the public lands.	emc0034
4.	d. If the permittee's grazing intrudes on existing HMA's then shouldn't either the permittee cede the use of an area utilized by horses or the HMA's reduced or eliminated? If the HMA's are established and wild horses may need the additional range, the new permittee not be permitted to graze her horses in those areas.	emc0082
5.	f. If horses need to be reduced as a result of drought, fire, or overgrazing will the permittee be required to move them onto other food sources i.e. pasture or hay at the permittee's expense? Or will BLM be responsible for removing them and paying the additional cost?	emc0082
6.	How will the BLM guarantee that this operation and project will be held to the same resource standards that cattle ranchers are held to, ensuring the health of our public rangelands?	emc0086
7.	9. Monitoring: Who will conduct monitoring, how often and where to document horse grazing impacts and track compliance with standards and guidelines for healthy rangelands?	emc0087
8.	If Ms. Pickens is successful in her "dream" and allowed to run horses on her allotment, what is the process to discontinue the sanctuary when the resource shows signs of heavy use or stress? How will her range be monitored? Will Standards and Guidelines for range management be followed? If necessary, how will the horses be removed? Will the AUM's be available to return to NI grazing status? I have seen serious degradation to the private resource where Ms. Pickens is currently stocking some unwanted reservation horses. The BLM should be aware that public land could be mistreated and prepare to deal with the damage.	emc0090

Table C-7.B
Comments Related to Rangeland Health Effects of Wild Horses

Comment No.	Comment	Cmt Ltr Code
9.	In addition, important winter range for wildlife will be sacrificed along with the general health of the range,	rmc0002
10.	Of utmost importance is establishing and maintaining a healthy and diverse plant community. This has been achieved by various procedures, including rest along with controlled distribution of the grazing herds through various means. Historically horses tend to congregate in an established herd area and resist being moved to facilitate range health. As a result critical winter wildlife habitat is in jeopardy. It is imperative that monitoring practices and a well defined plan to support thriving plant communities need to be reviewed before continuing with the plan. Provisions must be made for the ability to move horses when necessary.	rmc0002
11.	This RAC has always considered rangeland health the most important priority. A healthy range is the key to the future of America's Wild Horses as well as many other species. Nevada is currently experiencing a severe drought and the range has been negatively affected. In addition, the range is currently well over AML. How can BLM release 800-900 horses onto a range that is not healthy? This RAC wants BLM to recognize that a healthy range is the key to SAM's success and the key to the horse's success in this partnership. This RAC feels it is essential that before any additional horses are released, the horses are under AML and the range must be returned to a healthy condition with adequate forage to sustain the additional number of horses that SAM wants to care for.	emc0095
12.	Ecological condition of the rangelands Ranchers and cattle operations on public lands use grazing systems to manage livestock. With systems such as rest rotation, deferred grazing, dormant season use, and herding, rangeland health goals can be achieved. With utilization records and proper management the health of the land is positively impacted. Ranches work under set standards and guidelines and an allotment management plan. The Proposed Plan currently does not follow these same guidelines yet the SAM Organization will be managing a grazing animal. The Association suggests the SAM Organization be held to the same standard as a rancher managing grazing livestock.	emc0110
13.	Furthermore, the Spruce Allotment that will be used for the Proposed Plan is over appropriate management levels (AML) of wild horses. AML for the Proposed Plan is 277-464 wild horses and the last available wild horse census is approximately 711 wild horses. With no use from livestock, the rangeland within the Proposed Plan is already being degraded and not maintaining in a thriving ecological balance as set forth by the Wild and Free-Roaming Wild Horse and Burro Act of 1971. Monitoring practices and a well-defined, achievable plan to support thriving plant communities need to be outlined before continuing with the Proposed Plan. Additionally, the Association suggests an updated forage analysis be completed to determine the true carrying capacity of the Spruce Allotment.	emc0110
14.	Will SAM be mandated to abide by an allotment management plan and standards and guidelines given the task of managing a grazing animal?	emc0110

Table C-7.B
Comments Related to Rangeland Health Effects of Wild Horses

Comment No.	Comment	Cmt Ltr Code
15.	Has an updated forage analysis of the Spruce Allotment been completed?	emc0110
16.	<p>According to the internal notes from BLM Implementation Team meetings in 2008, obtained through the Freedom of Information Act and included at Attachment 6, precedent exists for the conversion of cattle Animal Unit Months (AUMs) to wild horse AUMs. In fact, the notes indicate that the late Richard Sewing of the National Mustang and Burro Association, utilized his grazing allotment for the maintenance of horses that he had adopted from the BLM program. There is no evidence to indicate that wild horses consume more forage or cause more environmental damage than cattle, as alleged in the Scoping Project Brief. In fact, BLM consistently understates forage usage by livestock, as documented by range specialist Dr. John Carter in the attached report: "BLM is understating forage consumption by cow/calfpairs by a nominal 50% based on the average body condition and frame scores. The implication of this on stocking rates is obvious. Based on forage consumption alone, not considering proper utilization, forage capacity and capability factors, BLM is over stocking allotments 33% based on failure to take into account current cattle weights and calves." (See the Attachment 8, report by Dr. Carter also available online http://projects.ecr.gov/tushar/pdf/Carter_AUM_paper.pdf)</p> <p>In addition, the BLM itself has noted that wild horses have fewer effects on riparian areas because they tend to come to these areas to drink and then leave, whereas cattle are known to wallow in and around water sources. The most recent citation from a BLM document can be found in the Black Mountain and Hardtrigger wild horse roundup EA which states, "Wild Horse bands tend to be mobile relative to domestic livestock. They do not tend to loiter in riparian areas or around range improvements such as troughs and salting sites." (see PDF-page 19 at https://www.blm.gov/epl-front-office/projects/nepa/22203/38764/40668/DOI-BLM-ID-B030-2012-0010_Wildhorse_Prelim_EA_Final.pdf)</p> <p>These factors must be considered by the BLM when converting cattle AUMs to wild horses.</p>	fxc0001
17.	<p>During recent years things have gotten out of hand, however. No longer are the needs and experiences of those living close to the land considered. Wild horses have been allowed to multiply far beyond the carrying capacity of the range. Grasses have been grubbed out. Springs have been annihilated. White sage flats have been trampled and beaten - to a point that some white sage flats have very few white sage plants growing on them any longer. Everything has suffered; deer, antelope, elk, horses, sage grouse, song birds - everything. So many horses were being run on the range, even when the Sorensen family took non-use over much of the area, the range continued to deteriorate. Those who are skeptical, need only look at the Antelope Complex Capture Plan And Environmental Assessment, which was released in September of 2010, for confirmation. Watering areas have been denuded, at times up to one hundred yards from seeps and springs. Hillsides trampled and beaten into trails, to a point that areas close to water often look as if they are spider webbed. White sage flats grazed to the ground.</p>	rmc0010

Table C-7.B
Comments Related to Rangeland Health Effects of Wild Horses

Comment No.	Comment	Cmt Ltr Code
	Without doubt, the Spruce-Pequop, Goshute and Antelope Valley area is the most abused and degraded area to be found anywhere within the Great Basin. It is no wonder that the Sorensen family was forced to sale. No ranching family could have survived the kind of adversity that was put upon the Sorensens' during recent decades.	

Table C-7.C
Comments Related to Wildlife – General

Comment No.	Comment	Cmt Ltr Code
1.	We are very concerned about the adverse impacts of the large-scale fencing proposal with this project - including its impacts in concentrating horse use - as well as livestock use - on pygmy rabbit, loggerhead shrike, Brewer's sparrow, sage sparrow, sage thrasher, sage-grouse and other very important native wildlife habitats, and the impacts on birds that may collide with the fence and die.	emc0006
2.	We are concerned that horses will be removed from lands outside the fence, and the forage and other resources that are allocated to the horses will be handed over to sheep and cattle ranchers whose herds are degrading the lands and waters. If that occurs, very important pygmy rabbit, migratory bird, raptor and other wildlife habitats, across this landscape will suffer intensified disturbance - as the AMLs did not fairly balance uses based on differences in use of food, cover, and space.	emc0006
3.	The area proposed within this eco-sanctuary provides key winter range to thousands of mule deer from Area 7 and 10; two of Nevada's largest and most important deer herds. Key to this EIS analysis is demonstrating how the horses can be managed without impacting the vegetative conditions crucial to the mule deer during their more stressful life-cycle periods.	emc0018
4.	Understanding that a large portion of the sanctuary boundary is not currently fenced and that additional cross-fences may be necessary to provide management control of the horses we are concerned about impacts to the wintering mule deer herds. Any fence that may be strong enough to control horse movements may impede a mule deer's ability to move and adapt to changing (site specific) climatic conditions during the deep snow winter months. As such, it is our recommendation that only wildlife friendly fences, of whatever materials, be considered.	emc0018
5.	The other passive livestock distribution control measure that has been mentioned is control of water availability, (turning off and on water troughs). Given the natural water that exists within the boundary of the eco-sanctuary we do not believe that this measure alone will be sufficient to control horse distribution. Additionally this measure may have effects on smaller more localized wildlife species that may not be able to adapt to loss of a proximate water source.	emc0018
6.	NDOW also has concerns with implementing and maintaining the benefits of the proposed Spruce Mountain Restoration Project in addition to the existing seedings (where NDOW and conservation groups have spent thousands of dollars to add key wildlife plant species into the mix). The Spruce Restoration Project was designed for fuels management but also intended to increase and improve approximately 10,000 acres of key wildlife habitats, especially the limited mule deer winter range. Although protection of the vegetative treatments is within the plan, horses increase the magnitude of fencing materials needed and may result in restricting wildlife use. The prescribed vegetative treatments will need protection and then very controlled use to insure proper recovery. The proposed grazing management system for the ecosanctuary needs to provide enough flexibility and control to incorporate these improvements.	emc0018

Table C-7.C
Comments Related to Wildlife – General

Comment No.	Comment	Cmt Ltr Code
7.	But more importantly, the environmental degradation contributed by the rapaciously repeated cycles of rapidly proliferating herds of feral horses and burros is more than the land and indigenous wildlife can sustain.	emc0034
8.	Wildlife and feral horse competition should be closely monitored. If indigenous wildlife, especially summering pronghorn, mule deer, elk, and sage grouse, are negatively impacted strong consideration should be given to excluding the sanctuary feral horses from these and other areas where wildlife is adversely impacted.	emc0034
9.	There is an abundant literature available to the public that clearly shows that feral horse over populations are contributing to this rapid deterioration of Great Basin ecosystems and declining wildlife populations. This opinion is based on personal observations of feral horses out in the hinterlands, the public lands, of the Great Basin over the past 35 years.	emc0034
10.	In addition they wouldn't be given the opportunity to interact with other species of animals, something required for any, "thriving natural ecological balance", to maintain the appropriate numbers of individual species within those areas, including those of the wild horses and burros, something restricted by fencing. Also, by virtue of the fencing, historical water sites and migratory routes, from summer and winter grazing areas, are cut off, further inhibiting the very concept of a, "thriving natural ecological balance".	emc0038
11.	Mule Deer, Elk and other wildlife will suffer when multiple use is thrown out the door.	emc0076
12.	Additionally, I'm concerned about the potential to disrupt the migration patterns of local species such as elk.	emc0062
13.	BLM should work toward a natural balance of predator and prey on the Spruce allotment. This could be a model for future wild horse HMA management.	emc0040
14.	Maintaining a non-breeding population of nearly 900 horses ranging over half a million acres is a biologic impossibility. There is simply no reasonable expectation that this could be accomplished in the field. The impact of the proposed number of animals on the environment and the native flora and fauna would be unsustainable, leading to significant negative impact across the board. This negative impact would include species that are currently close to listing as endangered.	emc0068
15.	h. What will be BLM's and the permittee's reaction to mountain lion predation or a resident wolf pack?	emc0082
16.	In addition, important winter range for wildlife will be sacrificed along with the general health of the range,	rmc0002

Table C-7.C
Comments Related to Wildlife – General

Comment No.	Comment	Cmt Ltr Code
17.	Of utmost importance is establishing and maintaining a healthy and diverse plant community. This has been achieved by various procedures, including rest along with controlled distribution of the grazing herds through various means. Historically horses tend to congregate in an established herd area and resist being moved to facilitate range health. As a result critical winter wildlife habitat is in jeopardy. It is imperative that monitoring practices and a well defined plan to support thriving plant communities need to be reviewed before continuing with the plan. Provisions must be made for the ability to move horses when necessary.	rmc0002
18.	Elko County does not believe that the wild / feral horse would be sustained in a healthy and beneficial manner for the wild / feral horse or wildlife and the proposed eco-system will not sustain the wildlife and numbers of wild / feral horses proposed.	rmc0003
19.	Question: How will sage grouse and other wildlife habitat be protected?	rmc0005
20.	The ecological condition of Spruce Allotment is in question, not only to support a change in use from livestock and wild horses, but also as to the importance of continued wildlife use. As stated in the Proposed Plan on page 14, the area to be used for the Eco-Sanctuary "is one of the largest wildlife hubs in the Elko District." As essential habitat for Endangered Species Act (ESA) candidate species such as sage grouse and pygmy rabbit, and crucial seasonal habitat for pronghorn, elk and mule deer, these components seemed to be mentioned but their importance overlooked in the Proposed Plan. As one of the "largest wildlife hubs in the Elko District," the component of the health and importance of wildlife populations cannot be alleviated as the Proposed Plan is drafted for an environmental impact statement (ESI).	emc0110
21.	How will habitat concerns be addressed and mitigated in the proposed area?	emc0110
22.	I. If this sanctuary becomes reality, it must be non-reproducing. Therefore, we ask BLM to evaluate the behavior and its impact on forage, water and wildlife of a herd of geldings, spayed mares, or a combination of the two in numbers equivalent to the carrying capacity of the sanctuary.	rmc0009

Table C-8
Comments Related to Tourism and Socioeconomics

Comment No.	Comment	Cmt Ltr Code
1.	I hope the residents of Elko, NV see this as a positive step for their community. I think it will boost tourism for their town and create jobs for the residents of that community. People will come to see the mustangs, it will be a great way for the public the see and photograph the mustangs.	emc0013
2.	With so few wild equines remaining on our public lands, I believe a golden opportunity is being missed to bring in tourist dollars by opting to remove these iconic animals instead of promoting ecotourism opportunities in Nevada. Free and wild mustangs are worth far more than allowing yet more destructive cattle to graze our public lands or allowing unsightly extractive industries to damage the land. No tourist would visit a state to watch a bunch of cows. The state should capitalize on the growing interest of viewing mustangs by the public -- many of whom were unaware these vestiges of the past still exist. For this reason it would seem logical to preserve these herds for ecotourism purposes instead of jeopardizing them. To this end, BLM should designate these public lands as a wild horse range and manage these public lands "PRINCIPALLY" for our wild horse herds under 43 C.F.R. 4710.3-2 and as Congress intended and as was written in the 1971 Wild Free-Roaming Horse and Burro Act.	emc0020
3.	SAM proposes they receive \$500 per feral head in order to manage the herd. That comes to a direct taxpayer cost of \$253,000. As noted above, the proposal declares there will be ecotourism activities, but does not discuss the costs which will be deducted and carried by the taxpayer. A dude ranch for beautiful people to view feral show-horses may well approach costs which overwhelm the annual quarter of a million to maintain the herd. SAM proposes to pay the County approximately \$10,000 for the retirement of the grazing fees in order to compensate for the loss of food production. Since that amount also can be deducted from SAM's taxes, it really remains a taxpayer liability but is mentioned here as indicative of the deceit involved in the venture.	emc0030
4.	Removing the \$303,000 value of the cattle from the economy, coupled with the direct burden of nearly \$253,000, results in a total direct annual financial burden of \$556,000. Since these are before the majority of tax deductions for operating this charity, the impending cost to the taxpayer is substantial indeed.	emc0030
5.	Further to that cost is the prudent consideration of wealth recirculation due to agricultural production. Each dollar of created wealth can reasonably be expected to turn over or multiply five times in the local and larger economy. That is, the initial value of the cattle will go into wages and general commerce which would not have occurred without the creation of that wealth. The economic functions of creating value where it did not exist or adding value to something existing are the essence of growth and vibrancy. These enlarge the pie. Simply transferring wealth does not generate growth since at best there is only a balance between the source and the destination. The pie is no larger, just redistributed.	emc0030

Table C-8
Comments Related to Tourism and Socioeconomics

Comment No.	Comment	Cmt Ltr Code
6.	If a recirculating wealth multiplier of five is considered for the agriculturally productive Spruce Mountain Allotment, there is a total annual economic impact of \$1,515,000. Properly accounting for the conversion to non-productive use then removes that greater wealth from the economy. When coupled with the direct taxpayer support of \$253,000, the total annual burden becomes \$1,768,000.	emc0030
7.	Again, SAM has graciously offered to pay Elko County \$10,000 per year for eliminating grazing rights. What SAM should be required to pay annually will be no less than \$556,000. When the full deductions for the feral ranch operation are considered, those required payments may reasonably range well beyond \$1,800,000.	emc0030
8.	<p>Taking Requires Making Whole</p> <p>In this case of replacement of a private business with a government-selected business, retirement of grazing rights essentially is a taking from the private businesses which held those grazing rights.</p> <p>Further to that, the federal government and the enviro-glitteratti must be subject to equal treatment under the law. Those takers must make the ranchers whole for the loss of livelihood. They also must make the County and State whole for their loss of economic value from food production on the land.</p> <p>As noted above, this making whole to Elko County and/or the State cannot be done as transfer payments from any State and/or Federal agency. Transfer payments simply move money among the taxpayer's pockets and do not truly recover the societal economic loss. The making whole must continue until the land is restored to agricultural production. The federal government does not own the land and has no right to take it out of production. The land is owned by the State of Nevada and the people, and removing it from production brings material harm to the State and the people.</p>	emc0030
9.	The burden placed upon the backs of American taxpayers to the tune of \$70 to \$80 Million a year, especially during the current woes of the economic down-turn and growing and exorbitant federal budget deficits	emc0034
10.	American taxpayers will still be carrying most of the financial burden of supporting such a sanctuary to the tune of \$230,406 per year for 500 head to \$276,000 per year for 600 head. This is based on the proposed BLM payment to Save America's Mustangs \$1.25 per head per day proposal as stated in the BLM's Antelope Complex Capture Plan and Environmental Assessment (November 2010, page 19) and as reported in the Winter 2011 Range Magazine's Mustang Special Report (page M13).	emc0034
11.	The Monument will bring tourism dollars. I know I'll be staying there on ventures through NV from now on. So that for sure will bring JOBS. Jobs and tourism dollars--can't get much better than that. Food and gas. Little tiny Wells will get tourism dollars. Money to feed its economy.	fla0016

Table C-8
Comments Related to Tourism and Socioeconomics

Comment No.	Comment	Cmt Ltr Code
12.	Ranching (raising of domestic livestock) generates a certain level of revenue for Elko County and local communities. Concurrently, other uses lumped under the heading 'eco-tourism (e.g. wildlife - wild horse viewing, western heritage experience, dude ranch, horse back riding, photography, resort/retreat/, etc.) also contribute a certain level of revenue to a region. These differing economic impacts should be addressed. There are also social impacts which should be covered in the analysis of the proposal.	emc0073
13.	How will the BLM's objective of local economic stimulus be fulfilled by the Eco-Sanctuary?	emc0086
14.	While the tourist component of the eco-sanctuary is valid and important, it is important to remember that the viewing of horses is the viewing of a wild animal. Restrictions should be put in place for the distance that one can get to the horse for the safety and welfare of the horse as well as the tourist. In addition, distance will protect BLM's liability should an incident occur. In addition, viewing should be limited in time, season, and scope as these horses still need to retain their wild characteristics and constant viewing can cause stress on the horse bands and may not meet BLM's objectives to promote good animal welfare.	emc0095
15.	This RAC encourages BLM to retain the right for educational opportunities within the public portions of eco-sanctuary. It is imperative that BLM retain control of this component so the correct message is relayed to the public and to dispel the myths and inaccuracies regarding the wild horse and burro program. This is a great opportunity to teach the public about rangeland health, managing for multiple uses and resource damage and proper care of public lands.	emc0095
16.	<p>The Association's understanding of the Proposed Plan is to use the Saving America's Mustangs (SAMs) private property as headquarters for an ecotourism business to be held mainly on public land using public wild horses, and, in turn, SAM organization will receive compensation for management of these public wild horses. While this plan may be good in theory, the economic value of an ecotourism business is subject to question and is not supported by any factual measurements. Secondly, the request of the SAM organization to be compensated for managing public horses at any cost does not support the economy. Essentially, the Proposed Plan will cost a taxpayer more to manage horses and remove agricultural production from this portion of public lands. The Association suggests the Bureau of Land Management (BLM) consider entering an agreement with SAM only if the Proposed Plan is revised to manage wild horses on private land, therefore, benefiting the taxpayer.</p> <p>While the economic value of ecotourism and the Proposed Plan can't be measured, the economic value of agricultural production being removed from this portion of public land can be measured. The ranch now owned by SAM, historically produced an economically sustainable sheep and cattle operation supporting both the local, state and national economy, in the form of reoccurring lamb and beef into the food supply and general cash flow within the community. Because of this particular concern, and others to follow in the future, the Association strongly suggests the any portion of land to be used for the Proposed Plan not be removed from the N-I Grazing District and the grazing permits not be retired.</p>	emc0110

Table C-8
Comments Related to Tourism and Socioeconomics

Comment No.	Comment	Cmt Ltr Code
17.	How will the value of the Proposed Plan benefit the local community and what is the formula to be used for this determination?	emc0110
18.	Once again, the BLM Wild Horses and Burros Program creates a public relations nightmare for anyone hoping to develop “eco-tourism” ventures. I cannot imagine any tourist being willing to spend their vacation dollars for the “privilege” Of observing unnaturally altered animals in unnaturally structured groups.	emc0111
19.	In summary I offer the following reasons for the wild horse EcoSanctuary to move forward: (1) Madeline Pickens knows about horses (2) she knows about money (3) she knows how to manage (4) she knows about entertainment (5) she knows about people (6) the Eco-Sanctuary will be another listing in the Nevada AAA Tourbook (6) the Eco-Sanctuary will prove to be a win-win for the wild horses, BLM and "we the people" (7) the surrounding areas will benefit with the Eco-Sanctuary (8) it's a win-win for the BLM as well, less round-ups(?) and a place for horses to roam free (9) I will promote visiting Nevada, its wild horse Eco-Sanctuary and surrounding areas in the State	rmc0007
20.	In this regard, we find that those responsible have no choice. A full blown Environmental Impact Statement (EIS) must be completed, addressing the following issues. (5) Long term/short term economic impacts on communities and our nation as a whole.	rmc0010

Table C-9.A
Comments Related to Recreation

Comment No.	Comment	Cmt Ltr Code
1.	Where the public could once get out of a car and walk on public lands, will the public now be fenced off of that land?	emc0011
2.	4) Will the public have to pay a fee (or tax dollars) to enter the eco-sanctuary, when we can see it for free now? 5) How much will the public have to pay for accommodations on the eco-sanctuary? 6) Will the public only be allowed to visit the eco-sanctuary during certain hours?	emc0011
3.	If the sanctuary does disrupt migration patterns or grazing lands, and it is still up for consideration, I would hope that the effect of redirecting these species on the hunting community and recreational industries that depend on these species would be considered as well.	emc0062
4.	2. Sanctuary: what are the recreational and education opportunities for the proposed sanctuary mentioned in the BLM document?	emc0087
5.	It is stated in the proposal that there will be an eco-tourism element. Wild horse information will be available and there will be classes discussing wild horses. I have seen some of the propaganda produced by SAM and distributed over the web and to school age children at a community day activity. The information was false, both scientifically and socially. An example of the misinformation can be witnessed at the Warm Springs Ranch. Ms. Pickens has constructed a number of Native American teepees. They are colorful, but if they are meant to be typical of the dwellings used by Great Basin Indians, they are inaccurate. The BLM will need to be responsible for the information given to tourists and assure that the public is not misinformed by a group with an agenda.	emc0090
6.	SAM mentioned that there will be an interpretive center and year round tourism component with wagon rides, lodging, etc on the property. They also guarantee that this land will remain open to other public uses. We encourage BLM not to grant SAM recreation permits for tourist events during hunting season as this could pose a danger not only to the tourists, hunters and horses during this time but could also expose BLM to liability issues should such an accident or incident occur.	emc0095
7.	1. The legal sanctuary for wild horses and burros is the HMA. The HMA, under law, is to manage a wild population capable of "free-roaming behavior" and the definition of a wild population is one that can "reproduce itself." This proposal (alternatives presented) violates that aspect of law by: c. impacts the publics ability to utilize their right under law to observe wild horses in their natural state on public land	emc0115

Table C-9.B
Comments Related to Transportation and Travel Management

Comment No.	Comment	Cmt Ltr Code
1.	Where the public could once drive our cars on public roads, will the "tours" of the eco-sanctuaries be on buses (like LTH) or wagons (like Indian Lakes Road)?	emc0011
2.	4. BLM identified public access for recreational purposes as a concern. TWR suggests that public access for all multiple-use purposes is a concern.	emc0032
3.	3. BLM identified public access for recreational purposes as a concern. CWR suggests that public access for all multiple-use purposes is a concern that must be addressed.	emc0033
4.	They [feral horse sanctuaries] should be located close to easily accessible public transportation routes like Interstate 80, Interstate 15, and Highways 50, 93, and 95, or 395, to allow easier access to "their" feral horses.	emc0034

Table C-10
Comments Related to Special Status Species

Comment No.	Comment	Cmt Ltr Code
1.	I am also not in favor of privatizing (via a fence) important archeological sites and rare bird nesting sites that are currently part of our PUBLIC lands.	emc0080
2.	How will sage grouse be protected since they need sage brush, forbs and tall grasses?	emc0082
3.	One of the multiple uses that could be jeopardized due to the year-round, complex nature of this sanctuary is wildlife habitat. In particular, given the ongoing research and analysis of the status of the Greater Sage-Grouse, the BLM must take into account any negative impact this proposed eco-sanctuary would have on the bird.	emc0084
4.	Grazing by horses and burros negatively affects sagebrush ecosystems and greater sagegrouse (<i>Centrocercus urophasianus</i>), a candidate species for listing under the Endangered Species Act (see Beever and Aldridge 2011, attached).	emc0088
5.	The proposed also encompasses Greater Sage Grouse, Pygmy Rabbit and Columbian Spotted Frog habitat that has been identified as critical and currently being destroyed by the wild / feral horses and burros in the HMA's.	rmc0003
6.	The NEPA process is intended to help public officials make decisions that are based on understanding of environmental consequences. Elko believes that no plan should be adopted wherein management of feral horses might jeopardize range and riparian conditions in such a way as to harm Sage Grouse, Pygmy Rabbits, Columbia Spotted Frogs or any wildlife and habitat. It is imperative that the mandatory research be completed prior to the creation of an Eco-Sanctuary within the Spruce Allotment.	rmc0003
7.	The ecological condition of Spruce Allotment is in question, not only to support a change in use from livestock and wild horses, but also as to the importance of continued wildlife use. As stated in the Proposed Plan on page 14, the area to be used for the Eco-Sanctuary "is one of the largest wildlife hubs in the Elko District." As essential habitat for Endangered Species Act (ESA) candidate species such as sage grouse and pygmy rabbit, and crucial seasonal habitat for pronghorn, elk and mule deer, these components seemed to be mentioned but their importance overlooked in the Proposed Plan. As one of the "largest wildlife hubs in the Elko District," the component of the health and importance of wildlife populations cannot be alleviated as the Proposed Plan is drafted for an environmental impact statement (ESI).	emc0110
8.	Given the presence and proximity of Sage Grouse Preliminary Priority Habitat and Preliminary General Habitat, we also believe specific management objectives need to be intertwined within the Draft EIS to highlight the manner in which on-the-ground wild horse management will be conducted to allow for the protection and enhancement of Sage Grouse populations.	emc0083
9.	What concerns us now, however, is the effects such mismanagement is having on, sage grouse, Columbia spotted frogs, and pygmy rabbits. If we understand correctly, agency personnel are required to pay particular attention to the effects their actions might have on these species.	rmc0010

Table C-10
Comments Related to Special Status Species

Comment No.	Comment	Cmt Ltr Code
	<p>In this regard, we find that those responsible have no choice. A full blown Environmental Impact Statement (EIS) must be completed, addressing the following issues.</p> <ul style="list-style-type: none"> (1) Long term/short term effects on sage grouse (2) Long term/shot term effects on mule deer. (3) Long term/short term effects on pygmy rabbits. (4) Long term/short term effects on Columbia spotted frogs 	
10.	<p>Agency personnel and academia have long avoided completing studies favoring private sector grazing practices. The "NEPA Process" is intended to help public officials make decisions that are based on understanding of environmental consequences. No plan should be adopted wherein management of feral horses might jeopardize range and riparian conditions in such a way as to harm sage grouse, pygmy rabbits, or Columbia spotted frogs. It is imperative that the following research be completed before efforts are undertaken to establish an Eco-Sanctuary within the Spruce Mountain area.</p>	rmc0010

Table C-11
Comments Related to Mining and Mineral Rights

Comment No.	Comment	Cmt Ltr Code
1.	Wild horse areas that have been illegally stolen must be restored and AMLs must be significantly increased to ensure genetic viability while at the same time livestock in wild horse areas must be eliminated or GREATLY reduced in order to allocate a FAIR SHARE of public lands and resources to our wild herds. Extraction industries must also not be given preference over wild horses whose lawfully designated areas are to be managed PRINCIPALLY for THEIR use. This would be a good start in giving back to the wild horses what is rightfully THEIRS by law.	emc0020
2.	<p>1. Taylor Western Resources (TWR) plans to reopen and mine copper at the Victoria Mine, which was initially developed and operated by Anaconda Copper Company in the 1970s. The mine is located in Section 5 of Township 28 North, Range 66 East in the Dolly Varden Mountains of Elko County. The mine is approximately 12 miles from US Highway 93A and access to the mine is on County Road 795.</p> <p>2. TWR wishes to inform the BLM and the proponent that, as owner of water rights in the area, TWR is concerned about water rights and that we are willing to meet with the proponent and BLM to discuss cooperative development which supports the Eco-Sanctuary and allows for TWR to implement the Victoria Mine plans.</p>	emc0032
3.	3. In addition to the patented Victoria Mine, TWR owns other mining claims in the area and suggests BLM ensure the Eco-Sanctuary does not impede the exploration authorized under the mining law. TWR believes exploration is compatible with the development intended by the proponent.	emc0032
4.	<p>1. Cardigan-West Resources (CWR) holds approximately 350 unpatented mining claims in the Dolly Varden Mountains of Elko County. CWR's claims extend from the Dolly Varden Springs area on the east across the mountain range to the west side. CWR also has mining claims along the west and north sides of the Dolly Varden range.</p> <p>2. CWR intends to continue exploration efforts on these mining claims and we suggest that BLM ensures the Eco-Sanctuary does not impede exploration operations as authorized under the mining laws. CWR believes that mineral exploration is compatible with the development intended by the proponent.</p>	emc0033

Table C-12
Comments Related to Cultural Resources

Comment No.	Comment	Cmt Ltr Code
1.	Question: How can cultural and archeological resources be protected?	rmc0005
2.	Cultural resources like the several prehistoric Native American constructed pronghorn antelope traps within the sanctuary boundaries should be protected from damage by the feral horses of the proposed sanctuary. They are extremely valuable not only for their archaeological significance through potential future studies, but also out of deep respect for the Native American's who inhabited the Great Basin for some 12,000 years prior to the arrival of Euro-American explorers and settlers. If there are other known sensitive cultural resources within the proposed feral horse sanctuary boundaries that could be damaged or destroyed, additional multi-disciplined and BLM approved archaeological field studies should be carried out and funded by SAM or other feral horse advocate groups as much as possible.	emc0034
3.	I am also not in favor of privatizing (via a fence) important archeological sites and rare bird nesting sites that are currently part of our PUBLIC lands.	emc0080

Table C-13
Comments Related to Conflicts with Other Projects in the Planning Area

Comment No.	Comment	Cmt Ltr Code
1.	Elko BLM has been wrongly segmenting NEPA analysis. BLM knows full well that eradicating trees and sagebrush in large land blocks by using huge bulldozers and heavy equipment, harmful chemicals and highly risky “prescribed” fire, plus road “improvements” will open up vast areas to more intensive human use and disturbances. At the same time that BLM is proposing this destruction and profligate waste of tax dollars, it is allowing mining exploration (which clearing trees makes much easier). It is leasing lands for Oil and Gas. It is also conducting a Travel Management Plan process that clearly relates to the Spruce Veg project and the increased likelihood of human-caused fires resulting from the Spruce Veg project. By creating hotter drier cheatgrass sites, the treatments will increase fire risk, including risk of human-caused fires. This will be coupled with the loss of habitat security that the project would cause. WWP raised concerns about how this destruction will affect the potential use for the sanctuary site, and BLM ignored them choosing instead to prejudice outcomes by endlessly piecemealing processes to try to downplay "significance" and avoid conducting the necessary EIS.	emc0006
2.	We request that BLM withdraw its destructive Spruce "Restoration" decision, as the effects of that will impact the Ecosanctuary by promoting weed wastelands, destroying pine nut producing pinyon pine and reducing habitat use and security for wildlife and wild horses.	emc0006
3.	NDOW also has concerns with implementing and maintaining the benefits of the proposed Spruce Mountain Restoration Project in addition to the existing seedings (where NDOW and conservation groups have spent thousands of dollars to add key wildlife plant species into the mix). The Spruce Restoration Project was designed for fuels management but also intended to increase and improve approximately 10,000 acres of key wildlife habitats, especially the limited mule deer winter range. Although protection of the vegetative treatments is within the plan, horses increase the magnitude of fencing materials needed and may result in restricting wildlife use. The prescribed vegetative treatments will need protection and then very controlled use to insure proper recovery. The proposed grazing management system for the ecosanctuary needs to provide enough flexibility and control to incorporate these improvements.	emc0018

Table C-14
Comments Related to Special Management Areas

Comment No.	Comment	Cmt Ltr Code
1.	<p>The proposed sanctuary boundary should be placed outside the Goshute Peak and South Pequop Wilderness Study Area boundaries. As clearly documented in the BLM's Antelope Complex Gather Capture Plan and EA (November 2010, pages 77-85), feral horses have already severely impacted the few springs and seeps and their associated critical to wildlife riparian environments. The proposed feral horse sanctuary boundary fence should be built along the west foothills WSA boundary to exclude feral horses from continuing to damage and destroy the limited and precious water resources to preserve them for indigenous wildlife use. The fences built around the sanctuary boundary should be constructed in as wildlife "friendly" manner as possible to allow free passage through the feral horse sanctuary. Exclusion of feral horses from these two WSA's is crucial as the excessive trampling and compaction around springs and seeps, along with the numerous feral horse trails created by excessive numbers of feral horses, inhibit native vegetation growth and induce spring snowmelt and precipitation runoff resulting in erosion. This instead of water percolation into the ground to recharge ground water that provides the source of water for the few critical springs and seeps in the area. Even if feral horses are excluded from these areas it will take years, if not decades, for natural annual freezethaw action and solifluction processes to loosen the feral horse compacted soils and for natural slope angles to recover that will hopefully allow native vegetation and ground water levels to recover. If this action is taken, it is highly recommended that the BLM closely monitor the springs and seeps and their associated critical riparian environments during recovery to ensure invasive and noxious weeds do not overwhelm these precious resource areas. Wherever possible manmade water sources close to the sanctuary boundary should be modified to provide water for wildlife outside the sanctuary boundary to prevent aggressive feral horse behavior towards wildlife and to provide water for wildlife during times of drought or whenever required for the benefit indigenous wildlife species.</p>	emc0034
2.	<p>We also identify that the three WSAs within or overlapping the boundaries of proposed eco-sanctuary: the Bluebell, Goshute Peak and South Pequop WSAs will be susceptible to increased damage due to the nature of the wild / feral horses being introduced. Introduction of wild / feral horses into these areas will cause substantial destruction to the resources that the BLM is attempting to preserve.</p>	rmc0003

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