United States Department of the Interior

BUREAU OF INDIAN AFFAIRS
Wind River Agency
P.O. Box 158
Fort Washakie, WY 82514

IN REPLY REFER TO

RECEIVED
FEB 1 2014
LANDER FIELD OFFICE

Richard Vander Voit, Field Manager
Bureau of Land Management
1335 Main Street
Lander, Wyoming 82520

2/13/2014

Dear Richard.

Thank you for meeting with me on February 7th , 2014 regarding the proposed Double D Ranch Wild Horse Ecosanctuary.

As discussed in the meeting, the Bureau of Indian Affairs (Bureau) has many concerns regarding the proposed Ecosancuary and it being included on trust lands administered by the Bureau and Shoshone and Arapaho Tribes. Approximately 680 acres of the proposed 900 acre Ecosancuary are on lands held in trust by the United States government for the benefit for Individual Indians and the Tribes. The map that accompanies the public scoping notice refers to these lands as being private which is misleading and incorrect.

The 680 acres of trust land encompass nine agricultural leases with Dwayne Oldham/Hornecker Livestock being the lessee of record. Agricultural Leases only allow lessees to run their own branded livestock on the leased acreage. Running other livestock not owned by the lessee is regarded as sub-leasing and is not permitted unless it is approved by the owner and the Bureau. Six of these leases (440 acres) are due to expire within the next three years and the Bureau has made the decision not to allow any subleasing on these six leases. The Bureau has the authority because of the way these leases were initially approved and because we believe it is not in the best interest of the landowners or the land. The remaining three leases (360 acres) are owned by one individual whom has apparently consented to subleasing. As Trustee, the Bureau has the responsibility to discuss this proposal with that individual and then determine if sub-leasing will be granted. On one occasion and in a letter dated December 18, 2013 to Dwayne Oldham, all the aforementioned issues and concerns were discussed.

Through our government to government relationships I would have hoped that the Bureau of Land Management, Shoshone and Arapaho Tribes and the BIA would have had formal consultation to discuss in detail this proposal prior to it going out for public comment. Many of the concerns the Bureau and the Tribes have could have been addressed at that time.

Acting Superintendent

Cc: Shoshone Business Council
Arapaho Business Council
Dwayne Oldham

United States Department of the Interior

BUREAU OF INDIAN AFFAIRS
Wind River Agency
149 Washakie Street
P.O. Box 158
Fort Washakie, WY 82514

FEB 2 7 2014

RECEIVED
MAR - 3 2014
LANDER FIELD OFFICE

In Reply Refer To:
Irrigation
Code 462

Scott Fluer
BLM Lander Field Office
1335 Main Street
Lander, Wyoming

Dear Mr. Fluer,

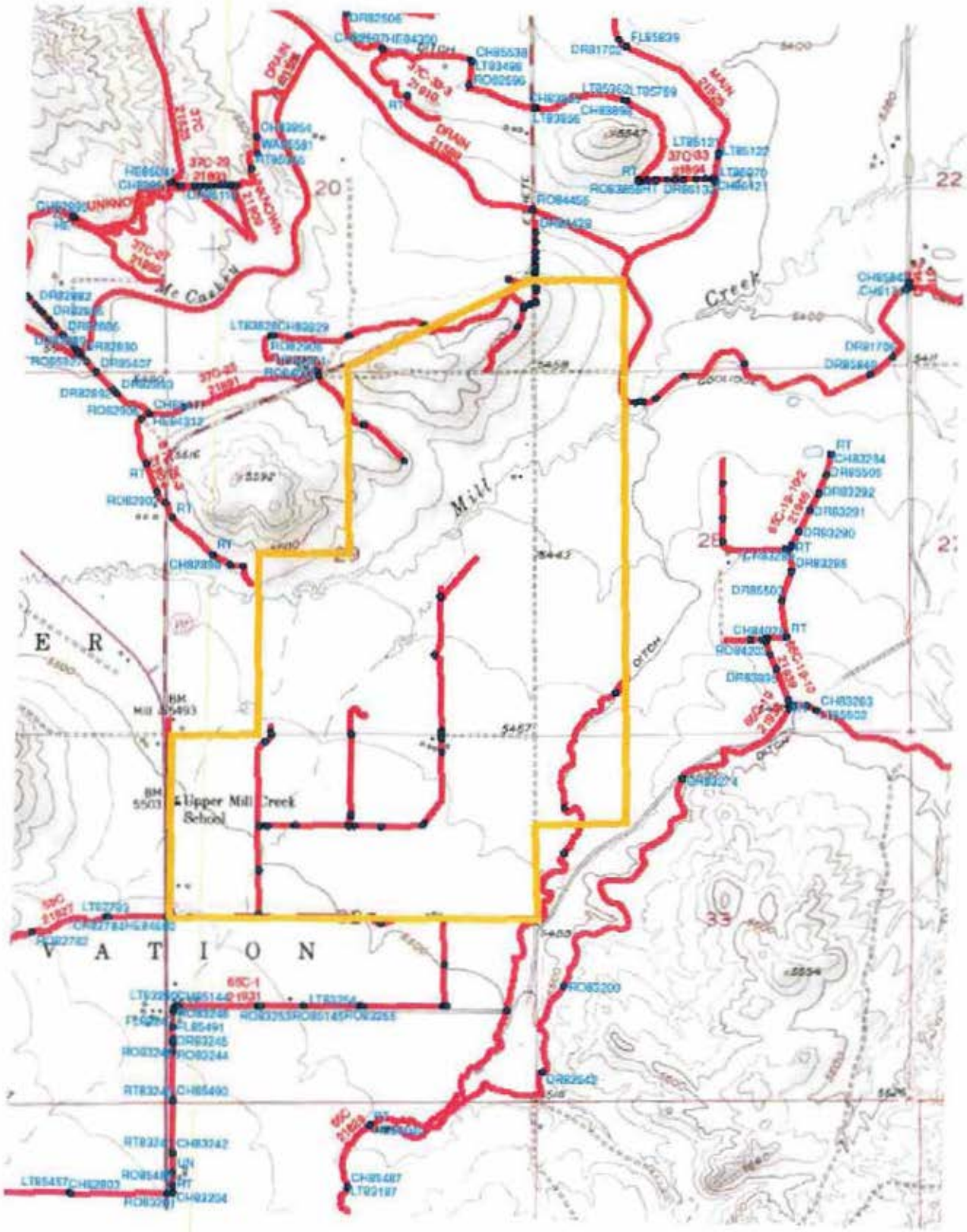
Thank you for the opportunity to comment on the Bureau of Land Management (BLM) proposed action to place 250 Wild Horses on the Wind River Indian Reservation for a proposed Wild Horse Sanctuary. We would like to commend you for taking a new approach to the wild horse issue. However, we do have some concerns.

The BIA Irrigation currently administers the operation and maintenance of the proposed area. There currently are irrigation water fees which are associated with these allotted and fee lands. Normally the lessee, allottee or fee owner is responsible for paying these fees. Is the BLM going to act as the new lessee with responsibility of payment for all O&M fees?

The existing irrigation infrastructure will need to be protected through fencing or other means to ensure damage to maintenance roads, ditches, turnouts, structures, canals and other irrigation assets within the BIA irrigation right of way is minimized. Any damage would need to be compensated to bring the irrigation system back to a desirable condition. We see a continuance nuisance of trespass as a potential with the natural attraction of the water to the animals. The BIA Irrigation does not have the staffing capability to adequately monitor the proposed plan as currently stated.

An existing irrigation infrastructure is located in the middle of the proposed site. This makes cross access for proposed animals very difficult without creating an extreme amount of potential damage. The attach map portrays the BIA irrigation right of way in red. The yellow boundary indicates what we believe to be the proposed Ecosanctuary.

What will happen if the Ecosanctuary is abandoned and it becomes necessary to bring the area back to previous conditions? Who will be responsible financially? Are existing boundaries going to be archived or referenced by markers to minimize the ease of any transition?



Mill
Creek
Upper Mill Creek School
E R
V A T I O N
20
22
28
33

I don't believe the horses would be considered part of the agricultural requirement for which water rights exist. This may be something the tribe and others may debate. Ultimately, we like the concept but are concerned about additional maintenance and financial responsibilities etc.

If you have any other questions, please feel free to contact our office.

Sincerely,

Brent Allen
Project Manager
Wind River Agency
Branch of Irrigation

United States Department of the Interior

BUREAU OF INDIAN AFFAIRS
Wind River Agency
P.O. Box 158
Fort Washakie, Wyoming 82514

RECEIVED
FEB 28 2014
LANDER FIELD OFFICE

February 28, 2014

Scott Fluer, Wild Horse Specialist
BLM Lander Field Office
1335 Main Street
Lander, Wyoming

Subject: Bureau of Indian Affairs, Wind River Agency Comments to Proposed Double D Ranch Horse Ecosanctuary Environmental Assessment dated February 3, 2014

Dear Mr. Fluer:

Thank you for the opportunity to comment on the Bureau of Land Management (BLM) proposed Double D Ranch Horse Ecosanctuary.

Correction of Project Location Map

The Project Location Map incorrectly represents Surface Ownership. Six Hundred Seventy Eight point Twenty Two Acres (678.22 Acres) (over 2/3's) of this proposed Ecosanctuary is in Trust Land status and should be shown correctly on the map. "Trust Land means any tract, or interest therein, that the United States holds in trust status for the benefit of a Tribe or individual" (25 CFR Section 162.101). Therefore, the 678.22 acres mentioned should be delisted from private land on the map and relisted as Trust Land.

Trust Land and Leases

Over two thirds of this proposed Ecosanctuary is in Trust Land Agricultural Leases administered by the BIA, Wind River Agency. Of this Trust Land located within the Ecosanctuary, the 678.22 Acres are divided into 9 different Agricultural Leases. It is the policy of the Bureau of Indian Affairs to not allow Sub-Leasing except when a lease is negotiated and approved with a written consent of the majority of the owners and approval of the BIA, Wind River Agency (25 CFR Section 162.230a). Subleasing means a written agreement by which the tenant grants to an individual or entity a right to possession no greater than that held by the tenant under the lease. Current Agricultural leases on the Ecosanctuary have not been negotiated for Sub-Leasing and therefore, cannot be Sub-leased as per Lease Stipulations agreed to by the Double D Ranch. Of these before mentioned leases, 6 of them are due to expire within the next three years with no guarantee for renewal.

The Fort Bridger Treaty of July 3, 1868 states the Wind River Indian Reservation was set up as a "Agricultural Reservation". 25 CFR Section 162.101 states that "Agricultural land means Indian land of Government land suited for the production of crops, livestock or other agricultural products, or Indian land that supports the surrounding agricultural community". The BIA feels that this proposal does not promote agriculture on the Wind River Indian Reservation but promotes a non-agricultural business (sub-leasing) and the BIA has trust responsibilities to look out for the best interest of the Indian Landowner.

Wild Horses on the Wind River Indian Reservation

Currently the Wind River Indian Reservation has approximately 3,500 wild and feral horses within the reservation boundary which are roaming free. Unlike the BLM we have no Congressional funding to collect and impound our problem horses, we have to rely on our normal operational funds to deal with these horses. We have a concern that that adding additional horses taken off Bureau of Land Management land will add more to our compliance and trespass issues.

Sub-Irrigated/Poorly Drained Soils and Irrigated Lands

The BIA is concerned with the number of horses on the Sub-irrigated and Irrigated Land, especially on the Trust Land Leases administered by the BIA. We feel that the horses should be off the irrigated land when irrigating to prevent the trampling of the hayland/pastureland. The sub-irrigated/poorly drained soils will be trampled by these horses causing environmental damage and what will be done with prevention/mitigation from the destruction of this hayland/pastureland. This will need to be address following a strict grazing plan and monitoring.

Noxious Weeds

The BIA has concerns because of the numerous noxious weeds within the proposed Ecosanctuary Area. Field Bindweed (Convolvulus arvensis L.) covers the ground in some areas of this proposed Ecosanctuary and other Noxious weeds like Russian Knapweed (Centurea repens L.) are also a problem within this proposed Ecosanctuary. What will be done to control these Noxious Weeds and keep them spreading from pasture to pasture, who will control them, and who will pay for the expense of controlling these weeds will need to be addressed.

Right of Way / Access Problems

Currently there is a Right of Way / Access issue on the North end of the proposed Ecosanctury. The BIA expects this issue to escalate due to the increased traffic on this access road. This issue should be addressed before the proposed Ecosanctuary is considered.

Trespass

Tribal Ordinance #52 and Resolution Number 6010 deal with trespass livestock on the Wind River Indian Reservation. We will assume that the BLM is the true and correct owner of these animals. If these Wild horses trespass upon Trust Land and/or Roadways within the Wind River Reservation Boundaries the BLM will take responsibility for these trespass animals since they are the owners. If this is not correct then this will need to be addressed.

Feral Dogs

The Wind River Indian Reservation has a feral dog problem without any current means to control these dogs. BIA has numerous reports of these dogs chasing domesticated livestock. The BIA is concerned with how these dogs will be dealt with when they begin to chase these wild horses. Horses have and a fleeing instinct which will be pronounced since these horses are wild and haven't become accustomed to dogs. We fear that this problem might cause safety issues if these horses were to escape the boundaries of the proposed Ecosanctuary, both to adjacent lands and to the general public on which WY 789 roadway boarders this Ecosanctuary.

Public Safety

As mentioned before the BIA is concerned with public safety. We have a fiduciary trust to protect people on the Wind River Indian Reservation. As stated in your Scoping Notice "the ecosanctury would be publicly accessible", most of this land on the proposed Ecosanctuary is Trust Land administered by the BIA. This could cause human trespass problems further taxing the responsibilities of the Bureau of Indian Affairs Law Enforcement which has jurisdiction on the Wind River Indian Reservation which includes the proposed Ecosanctuary area.

Once again, thank you for the opportunity to comment on the Bureau of Land Management (BLM) proposed Double D Ranch Horse Ecosanctuary.

Please do not hesitate to contact me at (307) 332-3718 should you have any questions.

Sincerely,

Acting Superintendent

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FEB 28 2014
LANDER FIELD OFFICE

To Scott Fluer - BLM mustang specialist

Please accept my positive comments for the creation of a wild horse sanctuary on private land just north of Lander WY. I am in favor of trying new solutions to address the problem of growing numbers of wild horses on public lands. As a satisfied owner of a adopted mustang I want to guarentee the future of availability of these great animals for adoption, viewing, and other uses and enjoyment.

Give this project your support. You have mine.

Carole Conaro
P.O. Box 1
Hudson WY 82515
307-330-4210

RECEIVED
FEB 25 2014
LANDER FIELD OFFICE

Lander Ecosanctuary EA, BLM_WY <blm_wy_lander_ecosanctuary_ea@blm.gov>

Ecosanctuary

1 message

joe carter <wildhorsies@icloud.com> Wed, Feb 5, 2014 at 3:16 PM
To: "BLM_WY_Lander_Ecosanctuary_EA@blm.gov" <BLM_WY_Lander_Ecosanctuary_EA@blm.gov>

How can an intelligent opinion be made with such limited information?
What is Dr. Oldham's position on horse slaughter?
Will ALL the horses be rendered sterile?
Will Dr. oldham be charging for tours, as well as being paid by BLM?
Will the horses have shelter during bad winter storms?
Will they be fed supplemental hay?
250 horses on 900 acres sounds like too many... Deerwood has 250 on 4,700 acres.
Is there a euthanasia policy, concerning age or how long at the facility or is it a lifetime policy?

Susan Carter
49 ellis Ranch
Santa Fe, Nm
87505

Sent from my iPad

Lander Ecosanctuary EA, BLM_WY <blm_wy_lander_ecosanctuary_ea@blm.gov>

CLG Scoping Comments on the Double D Wild Horse Ecosanctuary

1 message

Clerk <clerk@cebrooks.com> Tue, Mar 4, 2014 at 3:29 PM
To: "BLM_WY_Lander_Ecosanctuary_EA@blm.gov" <BLM_WY_Lander_Ecosanctuary_EA@blm.gov>

Dear Mr. Fluer,

Attached please find comments for scoping on the Double D Ranch Wild Horse Ecosanctuary submitted on behalf of the Coalition of Local Governments.

Please let me know if you have any problems with the attached document.

Thank you,

Amelia Pergl

Legal Assistant

C.E. Brooks & Associates, P.C.

303 E. 17th Avenue, Suite 650

Denver, CO 80203

t 303-297-9100

f 303-297-9101

CLG Double D Wild Horse Ecosanctuary Comments FINAL.pdf
50K

COALITION OF LOCAL GOVERNMENTS
925 SAGE AVENUE, SUITE 302
KEMMERER, WY 83101

COUNTY COMMISSIONS AND CONSERVATION DISTRICTS FOR LINCOLN,
SWEETWATER, UINTA, AND SUBLETTE - WYOMING

Scott Fluer, Wild Horse Specialist
BLM Lander Field Office
1335 Main Street
Lander, WY 82520

Re: Comments on the Proposed Double D Ranch Wild Horse Ecosanctuary

Dear Mr. Fluer:

The Coalition of Local Government (CLG) submits these comments on the Notice of Scoping.

1. Policy Considerations

CLG generally supports providing alternatives to the declining adoption for wild horses. Wyoming like most BLM offices has more horses in corrals than will be adopted. It continues to maintain excess numbers in herd management areas (HMAs) and lands outside of HMAs. In the past, wild horse sanctuaries worked in part because the manager was free to deal with the horses once on the sanctuary. BLM needs to clarify how this will work as well.

On the other hand, CLG objects to the idea that sanctuaries are a remedy for excess numbers of wild horses on public lands, especially in Wyoming. To the extent that BLM is committing to funding these sanctuaries, it is moving appropriated funds from mandatory activities to discretionary. This is improper and does a significant disservice to the public land users.

2. Insufficient Information

The notice is so brief that it does not provide adequate detail about the proposed action. The following are just a few issues that have been omitted.

a. Rates of reproduction

The notice fails to explain how the ranch will keep the number of wild horses to 250. The Wyoming Bureau of Land Management (BLM) assumes an 18% to 23% increase each year. Will Double D Ranch plan to sell off horses as it takes in new ones, or will it

simply stock up to 250 head and sell older wild horses as the numbers increase. If Double D cannot sell or otherwise transfer wild horses, what is the outside capacity of the 900 acres?

If Double D plans to use PZP, the wild horse numbers will still increase, since the PZP is less than 40% effective unless Double D commits to annual booster shots.

b. Sustainability

We have understood the BLM national strategy to move away from gathers due to the costs to keep wild horses in corrals. It would appear that the sanctuary option does not reduce the cost but puts it into another account called sanctuary.

CLG is not opposed to wild horse sanctuaries on private lands but questions how this is consistent with BLM's other policies, specifically addressing the continued costs of supporting wild horses.

c. How will trespass be handled?

Will the wild horses retain their status as a wild horse with full protection under the Wild and Free-Roaming Horses and Burros Act?

If the wild horses do not pass into private ownership, then if wild horses escape to private or public land, no one but BLM can gather them. This can create a significant management issue for the adjacent private, federal, and state lands. How will Double D or BLM deal with it?

If they are no longer classified as wild horses, then will federal support terminate?

CLG recommends that BLM provide comment on a draft environmental assessment to address these issues. The concept is a welcome one but the above issues need to be explored and analyzed.

Sincerely,

/s/ Kent Connelly
Chairman, Coalition of Local Governments

Lander Ecosanctuary EA, BLM WY <blm_wy_lander_ecosanctuary_ea@blm.gov>

Ecosanctuary

1 message

Kathy David <kelvira2000@yahoo.com> Tue, Feb 4, 2014 at 6:16 PM
To: "BLM_WY_Lander_Ecosanctuary_EA@blm.gov" <BLM_WY_Lander_Ecosanctuary_EA@blm.gov>

We are absolutely in favor of the proposed ecosanctuary for wild horses near Lander. We enjoy the recreational opportunities of BLM lands near us and enjoy taking pictures of the wild horse population. Thank you for your attention to this matter. Larry I. David, Kathy I. David, Riverton, wyoming.

Sent from my iPad

Lander Ecosanctuary EA, BLM_WY <blm_wy_lander_ecosanctuary_ea@blm.gov>

Wild Horse Sanctuary in Lander area

1 message

Magen Deans <magen.deans@gmail.com> Wed, Feb 5, 2014 at 3:17 PM
To: BLM_WY_Lander_Ecosanctuary_EA@blm.gov

Re: http://www.blm.gov/wy/st/en/info/news_room/2014/february/03lfo-ecosanctuary.html

I am writing to oppose the removal of wild horses from public lands. I don't understand why ranchers get to graze their sheep and cattle on public lands, but federally protected wild mustangs have to be removed?

End grazing leases, leave America's protected mustangs on the People's land.

Via email: **BLM_WY_Lander_Ecosanctuary_EA@blm.gov**

March 4, 2014

Scott Fluer
Wild Horse Specialist
BLM Lander Field Office
1335 Main Street
Lander, WY 82520

Re: **Wild-Horse Ecosanctuary Proposed for Double D Ranch -- WY -- Comments**

This letter responds to BLM's solicitation of **scoping comments** from the public regarding a proposed **wild-horse ecosanctuary** to be established on the 900-acre private property known as the Double D Ranch, located seven miles north of Lander, Wyoming. The facility would care for up to 250 captive wild horses on behalf of BLM and be compensated on a fee-per-horse basis.

Below are the respective links to the press release, scoping notice, and project-location map.

- http://www.blm.gov/wy/st/en/info/news_room/2014/february/03lfo-ecosanctuary.html
- http://www.blm.gov/pgdata/etc/medialib/blm/wy/information/NEPA/lfodocs/doubledecosanctuary.Par.49871.File.dat/scoping.pdf#page=1&zoom=auto,0,792
- http://www.blm.gov/pgdata/etc/medialib/blm/wy/information/NEPA/lfodocs/doubledecosanctuary.Par.22285.File.dat/map.pdf

As requested, I have endeavored to make my comments as specific as possible, addressing the adequacy of the proposal and the merits of alternatives. I hope that my comments will be deemed valuable, offering an informed analysis of what is at stake. I write as an interested party in behalf of the wild horses of Wyoming, whose freedom would be impacted by this project.

Background

BLM proposes to approve an application from Double D Ranch to care for up to 250 captive, gelded wild horses on a fee-per-horse basis. Because BLM is planning massive wild-horse removal-actions in Wyoming, wild horses sent to the Double D Ranch will likely have been captured from Wyoming herd management areas (HMAs).

Double D would be open to the public and promote itself as a tourist attraction -- that is, as an ecosanctuary for wild horses -- generating additional income via other attractions, such as a learning center, tours, a gift shop, and a campground.

Objections

1. The main purpose of the Wild and Free-Roaming Horses and Burros Act was to prevent the "fast-disappearing" mustangs from ... fast disappearing. BLM has essentially been pursuing an agenda that is antithetical to the Act -- an aggressive equid-cleansing policy of removing thousands of wild horses from their legally-designated habitats and cooping them up in holding facilities. We-advocates for the wild horses are displeased by BLM's nullification of the Act. We reject holding facilities and pseudo-sanctuaries. The true ecosanctuaries are the herd management areas and the original herd areas. The HMAs and HAs are where the wild horses belong and where they should be managed "as an integral part of the natural system of the public lands."

2. It is deceptive to market holding facilities as ecosanctuaries. Per the current model at the Centennial site, the captive wild horses are sterilized shadows of their former selves, languishing in the absence of normal herd-structure and band-dynamics. There are no stallions. No mares. No foals. Just geldings -- which do not exist in nature. There is no thriving, natural, ecological-balance present. Tacking on a learning center and other tourist-y features to a holding facility does not transform it into an ecosanctuary.

3. BLM-Wyoming has a shameful record in regard to the wild horses under its jurisdiction. I refer specifically to the back-room deal BLM made with "checkerboard" grazing-permittees. That stealth-agreement calls for the decommissioning of approximately 2,000,000 acres of wild-horse herd management areas, removing a third of the state's mustangs, and sterilizing the White Mountain herd, which is popular with tourists. It would seem that BLM does not want truly wild horses on statutorily-dedicated public lands competing for tourists with the "ecosanctuaries" it is establishing in their stead. Kowtowing to permit-holders, encouraging them to file suits against the Government, making clandestine deals with them -- such behavior is unworthy of public-sector professionals. BLM knows that the current grazing-regime is ruining Wyoming's rangelands. It's not the comparatively few wild horses, so widely dispersed, that are causing the degradation. It is the hundreds of thousands of cattle, ***grazed improperly***, that are doing the damage.

4. A recent *WyoFile.com* news-article reported that wild horses 10 years old and up would be BLM's target-group to send to the proposed ecosanctuary because of their supposedly-poor prospects for adoption. While well-meaning in its intention, this plan is misguided. Elder horses are the very ones who, by their dominance and leadership, keep horse-society in order and herd-population in check.

Recommendations

1. BLM must comply with the provisions of the Wild and Free-Roaming Horses and Burros Act. It would be great if the Agency could embrace the values that the Act embodies, and if BLM would honor the will of Congress, which passed the Act unanimously. However, even if BLM would prefer not to comply, it must follow the law. To reform, BLM must manage the wild horses on public lands. Yet, there is a role for ecosanctuaries -- as ***temporary*** refuges for wild horses or burros whose HMA has suffered a catastrophic event, such as a fire. The affected wild-horses, as intact bands, could be relocated to ecosanctuaries to be cared for until their home-range recovered sufficiently for them to return.

2. A true ecosanctuary must feature the full complement of wild-horse herd-members. There must be bands of horses, each consisting of a stallion, his mares, and their foals. The population must include all age groups. The elder horses provide leadership and prevent excess reproduction. As a back-up, fully-reversible contraceptives could be used judiciously. Because captive horses' numbers must be kept low due to the limited acreage of the ranch, a studbook must be maintained and careful genetic-management practiced. Thorough record-keeping is essential. Close monitoring by BLM will be required.

3. To restore the range, precisely-planned, time-controlled-grazing -- Holistic Management -- needs to be implemented on BLM-administered lands. Through this method, the range will recover and the water-cycle will normalize. Livestock-grazers and BLM staff will work in partnership, per a coordinated resource management (CRM) process, to design the grazing schedules. Holistic Management allows for increased numbers of cattle, and it has been shown to lead to greater profits for producers. Wild horses need no such management because their nature is to stay on-the-move. The cattle and mustangs will no longer be in competition. Holistic Management will empower BLM to fulfill its mandate to protect and conserve America's wild horses and burros. Certainly, this is a win-win-win strategy.

Note: Some BLM field offices have rejected implementing Holistic Management on the basis of their misunderstanding about fences. Time-controlled grazing does not require the range to be subdivided into paddocks using permanent fences. In fact, portable hot-wire -- powered by solar panels -- can be successfully used to corral the cattle. Of course, this method requires permit-holders to be true range-riders -- to "keep them doggies movin'." The Holistic Management approach is actually a traditional way of raising cattle. It harkens back to an earlier era in America when cattlemen closely watched over their herds. Livestock operators that are committed to ranching -- and aren't just in it as a hobby or for a tax write-off -- will embrace this effective method of range-and-livestock-management.

4. BLM needs to let elder wild horses fulfill their role of providing leadership, maintaining equine social-order, and keeping a herd's population under control. Here's why we know that's their purpose. The International Society for the Protection of Mustangs and Burros (ISPMB) released the results of a 13-year study of wild-horse

population-growth. ISPMB managed two herds per the "hands-off" approach -- that is, at the "minimum feasible" management-level -- specified by the Wild and Free-Roaming Horses and Burros Act. There were ***no*** roundups. Findings: The herds grew at a modest four-to-five-percent annual rate. The study concluded that an intact social structure -- particularly **the presence of elder horses** -- kept growth in check. Contrast ISPMB's non-meddling method with BLM's mass-removal method. Herds under BLM's jurisdiction allegedly increase by 20 percent, compounded, per year. The glaring discrepancy in growth-rates invalidates BLM's scorched-earth policy. Here is the link to the ISPMB report.

- http://www.ispmb.org/herd_social_structures.html

Value All Comments -- Publish All Results -- Strive for Consensus

I urge BLM to publish the ***number*** of persons that respond to the scoping. Show that you value every response on its own merits rather than labeling some as "form letters." The Constitution provides for the right of citizens to petition the Government for a redress of grievances. The Constitution does not require each complainant to formulate a unique letter. Indeed, the very word "petition" connotes a document that multiple parties sign in agreement and solidarity regarding a particular issue. At court, there are even class-action suits, wherein many plaintiffs join together to seek justice regarding a matter of mutual concern. One action, many parties.

BLM should disclose ...

- How many responses were received,
- How many and what percentage favored particular courses of action and why,
- The different alternatives that were proposed, and
- Modifications, corrections, improvements that BLM will make per the public input.

BLM is supposed to build consensus. The public involvement component is designed to get feedback from those persons interested enough to participate in the decision-making process. Disregarding feedback leads to decisions that are not supported by the majority of stakeholders.

Recommendations: Each and every comment must be honored fully, individually, and collectively, with the numerical results published. Remember that the public lands belong to We the People, not just to those individuals that happen to reside nearby or to those who wish to capitalize on our lands.

Partnership with Wild-Horse-and-Burro Stakeholders

The Wild Horse and Burro Program is a high-profile / hot-button topic. The Program is national in scope, and is monitored by dedicated advocates. Merely depending on scoping comments received from the public is beneficial, but consultation-efforts should not end there. BLM needs to cultivate real partnerships and establish good

working-relationships with mustang-advocates -- just as you have with permit-holders, Tribal Leaders, and other stakeholders. Representatives of our sector must be formally included in the planning process.

Recommendations: BLM district and field offices that administer wild-horse-and/or-burro programs need to establish advisory committees of mustang-advocates and work with us to formulate policy -- such as with regard to establishing an ecosanctuary. I call upon BLM to ...

- collaborate,
- consult,
- cooperate, and
- coordinate

... with wild-horse-and-burro advocates regarding this and other ecosanctuaries. Wild-horse advocates across the nation look forward to consensus-based decisions and to the development of best management practices concerning wild horses and burros. As the recent National Academies of Sciences report said: "... management should engage interested and affected parties and also be responsive to public attitudes and preferences. BLM should engage with the public in ways that allow public input to influence agency decisions."

Conclusion

I urge BLM to adopt the recommedations submitted herein and by other wild-horse-and-burro advocates. Thank you.

Sincerely,

Marybeth Devlin
6880 SW 27th ST
Miami, FL 33155

305-665-1727

marybethdevlin@bellsouth.net

Lander Ecosanctuary EA, BLM_WY <blm_wy_lander_ecosanctuary_ea@blm.gov>

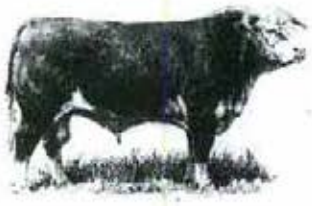
Ranch for BLM horses

1 message

Michael Ezekiel <authoress2@gmail.com> Wed, Feb 5, 2014 at 4:33 PM
To: BLM_WY_Lander_Ecosanctuary_EA@blm.gov

I think it's great that BLM is considering another ranch to take 300 wild horses! Since they are supported by BLM (US citizens), why not let them live well instead of in concentration camp like places? Yes!
Linda Kurgan

FREMONT COUNTY CATTLEMAN'S ASSOCIATION



fremontcattlemen@gmail.com

February 25, 2014

Scott Fluer, Wild Horse Specialist
BLM Lander Field Office
1335 Main Street
Lander, WY 82520
Via Email: BLM_WY_Lander_Ecosanctuary_EA@blm.gov

Dear Scott,

The Fremont County Cattleman's Association thanks you for the opportunity to comment on the Double D Ranch wild horse proposal.

We are generally supportive of any effort to manage horses effectively. We are most supportive of plans which control the horse populations to levels within herd targets and across ranges. Our observations suggests that when BLM manages herd levels at the lower end of AML it takes a much longer time to reach excess levels as opposed to managing for a middle of the road or simply within AML.

Being generally supportive means that we are supportive so long as the horses that occupy the proposed Double D Ranch are gathered from herds that are currently in excess in Wyoming. We would prefer the Proposal is stocked by a BLM gather of excess horses from Allotments in Fremont County. We would find it nearly impossible to support a sanctuary if the horses come from any State other than Wyoming.

Sincerely,
Jim Hellyer, 2014 President

OFFICE OF THE FREMONT COUNTY COMMISSIONERS

Fremont County Government: Working To Best Serve You.

1884

450 No. 2nd Street, Room 205
LANDER, WYOMING
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Lander, WY 82520

KEJA WHITEMAN
Vice-Chairman
P O Box 210
Riverton, WY 82501

TRAVIS BECKER
525 Westchester Circle
Riverton, WY 82501

STEPHANIE KESSLER
P O Box 584
Lander, WY 82520

LARRY ALLEN
3925 Badwater Drive
Lysite, WY 82642

JULIE A. FREESE
County Clerk
and
Clerk of the Board

MARGY IRVINE
Deputy Clerk

February 26, 2014

RECEIVED
FEB 28 2014
LANDER FIELD OFFICE

Scott Fluer, Wild Horse Specialist
BLM Lander Field Office
1335 Main Street
Lander, WY 82520

RE: Scoping Notice – Proposed Double D Ranch Wild Horse Ecosanctuary Environmental Assessment

Dear Scott:

Following are comments from the Board of Fremont County Commissioners referencing the above mentioned Scoping Notice.

We question the sustainability of addressing out of control wild horse herd populations across the west using ecosanctuaries. The number of excess wild horses and potential numbers and acreages in ecosanctuaries do not match up. In our opinion, it is incumbent upon the federal government, who assumed control over wild horses, to develop and implement a sustainable management strategy to prevent severe, irreparable resource damage.

As to this particular application, we would only support excess Wyoming horses coming to this ecosanctuary. We have a concern about the infrastructure of this particular applicant as a level of management and veterinary care must be conducted on the premise. We do not believe those facilities are either adequate or of good repair. In order to keep these wild horses upon the ecosanctuary property, an adequate containment strategy must be implemented, as we believe the exterior fences are inadequate. We would have a concern about the impact upon the riparian and semi riparian areas within this sanctuary, as that number of horses, inadequately managed, can cause significant damage to these areas.

Because we believe the property is inadequate to produce feed to hold the 200-250 wild horses, a significant amount of supplemental feed will be required. Therefore, there will be a significant impact to hay prices within Fremont County, thereby impacting ranchers who also rely upon purchased hay to adequately care for their livestock.

We would also ask that any opportunities for economic development through viewing would be analyzed as well as educational opportunities about wild horses and management.

Because this ecosanctuary is within the exterior boundaries of the Wind River Indian Reservation, we would hope that communication and management of the ecosanctuary would be satisfactory to both tribal and local governments.

Thank you for the opportunity to provide comments.

Sincerely,

BOARD OF FREMONT COUNTY COMMISSIONERS

By: Douglas L. Thompson
Douglas L. Thompson, Chairman

FREMONT COUNTY COMMISSIONERS
FREMONT COUNTY, WYOMING
450 N. 2nd #220
LANDER, WY 82520

Hasler
02/27/2014
US POSTAGE $00.48⁰
ZIP 82520

Scott Fluer, Wild Horse Specialist
BLM Lander Field Office
1335 Main Street
Lander, WY 82520

8252032654 C002

Lander horse sanctuary

1 message

Mary Gerty <maryegerty@gmail.com> Fri, Feb 7, 2014 at 10:43 AM
To: "BLM_WY_Lander_Ecosanctuary_EA@blm.gov" <BLM_WY_Lander_Ecosanctuary_EA@blm.gov>

Dear BLM,
I would like to comment on the proposed wild horse sanctuary:
I am all for it as a humane way to house and care for these "unwanted" wild horses. I also think that it can be an excellent public information tool.
Thank you,
Mary Gerty
PO Box 9256,
Jackson, WY 83002
Mgerty@ bresnan.net

Sent from my iPad

Lander Ecosanctuary EA, BLM_WY <blm_wy_lander_ecosanctuary_ea@blm.gov>

wild horses

1 message

Lawrence Gillet <gilletlb@northnet.org> Fri, Feb 7, 2014 at 7:19 AM
To: BLM_WY_Lander_Ecosanctuary_EA@blm.gov

Sir:

The BLM lies just as nastily as the Bush administration. Obama isn't much better as he could end it's criminal policy of trashing wild horses. The 1971 law say horses are to be "free roaming" not in pens or management areas. As to your lie that they are over-populating—lean to count zeros. There are less than 90,000—that's thousands—wild horses in and out of captivity in our west. There are +10,000,000 —that's millions, count the zeros, cattle, sheep, elk, deer, etc, polluting mines, oil/gas wells w/damaging infrastructure, housing developments, etc. all on our public lands which are supposed to be kept wild and clean! Horses use exponentially less water than any of these other uses, and water is the scarce resource, remember?

The BLM should be eliminated and replaced with scientists/horse people who respect the land and don't want to exploit it for big money as the paid off BLM of today exploits our public lands.

A disgusted voter,
Peggy conroy
West Chazy, NY

Lander Ecosanctuary EA, BLM_WY - blm_wy_lander_ecosanctuary_ea@blm.gov>

Your proposed WY wild horse sanctuary

1 message

Barbara Leonard <blpaints@hotmail.com> Fri, Feb 7, 2014 at 10:57 AM
To: "BLM_WY_Lander_ecosanctuary_EA@blm.gov" <blm_wy_lander_ecosanctuary_ea@blm.gov>

Do you really think the public is dumb enough to "settle" for a sanctuary when our wild horses & burros belong on their rightful legal lands? You can take your sanctuary and "stick it" along with all your other ridiculous BLM strategies. Won't work....we're not that stupid! Barb Leonard, 4574 State Highway V, Seymour MO 65746, 417-818-0366

RECEIVED
MAR -3 2014
LANDER FIELD OFFICE

February 28, 2014

RV

Bureau of Land Management
Scott Fluer, Wild Horse Specialist
Rick VanderVoet, Field Manager
BLM Lander Field Office
1335 Main Street
Lander, WY 82520

RE: Proposed Double D Ranch Wild Horse/Burro Eco-sanctuary --4700 (WYO50)

We wish to point out significant impacts and express our opposition and strong concerns regarding the placing of BLM horses and burros on a proposed BLM eco-sanctuary 7 miles north of Lander. The proposed site directly borders our deeded lands and leased land, and live water and irrigation run-off from the proposed site directly flow into and affect the waters on our ranch. Our family lives in the direct area and has raised high-quality performance quarter horses and cattle on our ranch here for 42 years. As such, we have concerns about the impacts a wild horse and burro eco-sanctuary in the immediate area may cause.

1. EQUINE & JURISDICTIONAL ISSUES ON THE RESERVATION :

Placing an eco-sanctuary site on confined pasture leases within the Wind River Indian Reservation boundaries does not offer a sound habitat for BLM animals or for neighboring equines because of the abundance of unmanaged horses and a lack of current equine control that already exists across much of the reservation. In this regard, problematic jurisdictional issues also exist for the policing of livestock on the reservation as well as for incidents of trespass.

Traditionally and culturally, horse grazing and management practices on the Wind River Reservation experience little to no governing by agencies and often include a weakened ability to care for animals by many reservation horse owners. The highways and idle lands close to the proposed site are routinely strewn with small bands of horses often owned by people whom allow their animals to run free, whom turn their animals out on the roads for pasture, and whom may not or cannot care for their animals, maintain or manage the fertility of their herds, and/or handle the horses. The result is somewhat of a "lawless" equine environment across much of the reservation with many animals grossly underfed and deprived of water and mismanaged in terms of fertility as free-roaming stallions often cross over multiple sections of land, break fences, and endanger people and other animals.

Jurisdiction on the reservation is subject to a variety of perceptions which leads to a lack of clarity and action regarding loose livestock. When state, county, and tribal authorities are called upon, help is rarely garnered in locating owners of the free-ranging reservation animals, in ensuring the humane treatment of animals on the reservation, and with ensuring the safety of all people and all other animals. To compound things further, the animals are often not branded and are not able to be handled. Simply fencing out animals is problematic because the unmanaged

animals are then haphazardly put on the highways or sent on down the highways to other idle and owned lands in the area. State and county entities are reluctant to get involved due to complex jurisdictional issues, and the tribes and the Bureau of Indian Affairs on the Wind River Indian Reservation do not have the capacity or manpower to regulate unmanaged horses that already exist all over the perimeters of the proposed eco-sanctuary area.

In short, the Wind River Indian Reservation already has a significant problem with equine animals at large. Adding a BLM eco-sanctuary to the area poses several hazards because the large band of horses would only serve as a magnet for the free-range horses that do not respect fences and that are not fertility controlled which in turn creates an even larger risk to all horses in the area. When problems occur, it is important to note that jurisdictional issues exist regarding federal, state, and tribal livestock control in our area. Before BLM horses are placed on the reservation, planning and certainty must be in place by federal, state, county, and tribal entities to address concerns under the complicated jurisdictional circumstances that engulf the reservation.

2. ENVIRONMENT IN SUB-IRRIGATED AREAS IS NOT CONDUCIVE TO TOURISM OR TO LONG-TERM EQUINE PLACEMENT

The proposed area is not conducive to BLM equine placement because the lower section of the area is largely sub-irrigated and boggy throughout the summer and fall. The swampy ground situation is often not feasible for vehicle access or ATV access, which makes ecotourism in the area incomprehensible in addition to the trespassing potential if tourists attempt to gain access through the multiple deeded neighboring properties bordering the site.

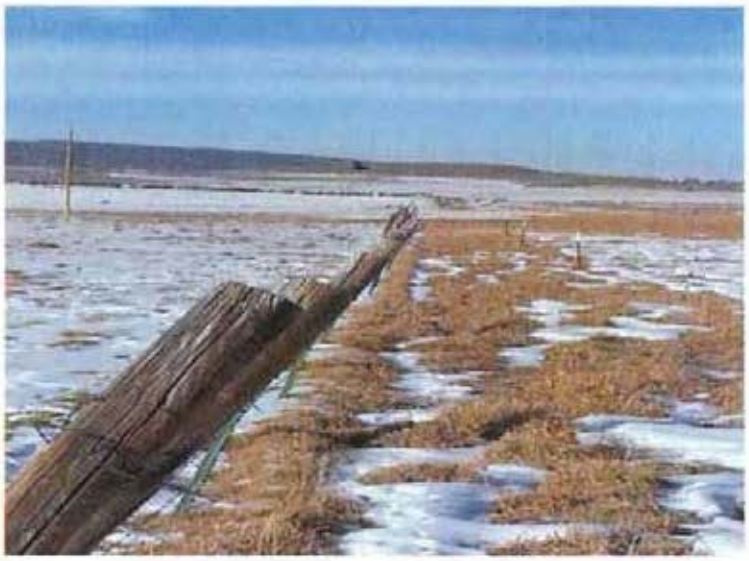
Animals fenced in on the spongy area often have a difficult time navigating the severely compromised landscape of bumps and floating, unstable land. In fact, many parts of the area are simply unusable at times which makes the available acreage for equine accommodations grossly overestimated. It is important to note, the multi-fenced, sectioned area does not offer an open expansive environment for free-roaming behavior and does not offer treed areas for shelter or desert and mountainous areas of natural habitat.

The proposed area's sub-irrigated, boggy ground is predisposed to excessive flies, mosquitos, deer flies, nose flies, and other biting insects which makes the area further not conducive to long term holding of BLM horses. Animals placed in that boggy area year around generally begin to push on fence lines in search of more accessible and palatable feed and in search of relief from insects. These factors drastically reduce carrying capacity on the proposed site.

3. MANAGEMENT & FENCING IN THE AREA:

Our residence is in the immediate area and we face daily and sometimes hourly fence management issues and animal control in the area, while the proposed applicant's primary residence is in Lander and he is away much of the time. The picture below (taken February 9, 2014) indicates a current example of the property line between land we utilize on the right and

the proposed applicant's pasture on the left. Since the applicant has leased the property on the left, his stock in the boggy pastures have continually pushed on the fences in search of food, high ground, and relief from the swamp's intense insect population.



On this particular fence line, steel posts have been placed in to upright the fence and even those are pushed over in the swampy ground by the applicant's stock. On our side of the fence (the right side of the picture), we continually rotate our animals and do not overpopulate our properties, so our animals do not push fences towards our neighbors. In this respect and also shown in the above picture is an electric fence ten feet off of the fence line that we utilize to keep our horses completely away from the pushing of the proposed applicant's current herd.

Fencing in the area is without a doubt of immediate concern. It is important to further note that not all fences in the proposed area are on surveyed markers. For example, the fence line on the north side of the proposed site directly borders our deeded land and needs to be surveyed and moved to its appropriate placement as it is currently infringing on our property. Also, it is important to note that horses do not respect fences built for cattle and can rub on and eat wooden posts, even new treated posts, which demands that constant monitoring and diligence be in effect.

Continual management in the area is a must because the proposed applicant's current herd of horses is already a magnet for free-roaming area stallions. A herd of BLM horses would increase the magnetic equine situation putting all area stock at risk. Our stock has already been damaged from this issue because in the late summer of 2012 one of our highly-bred quarter horses had to be euthanized due to a severe wire cut brought on by conflicts from the current horses ran by the proposed applicant and during the summer of 2013 a free-roaming stallion from several pastures over chased the applicant's horses through fences into our property multiple times. Even when using electrical fencing to hold our horses away from the fence, horses from other reservation

properties are drawn to the proposed applicant's herd and readily break through the proposed applicant's property into ours. This problem would only be compounded if an eco-sanctuary were placed in this volatile area.

While our domesticated animals respect our electric fencing, it is of importance to note wild horses and other horses from across much the reservation have no experience or respect for electrical fences. These animals end up charging through the fences when the electricity contacts them. Furthermore, electric fences, if not monitored on a daily basis, can easily become broken, grounded-out, and non-working. During much of the year, it would be difficult for all parties to monitor fences including electric fences in wet, swampy areas that cannot be readily accessed, especially if one does not directly live here.

4. DISRUPTIONS OF NATURAL MILLCREEK WATERWAY & DAMAGE TO COMPROMISED IRRIGATION INFASTRUCTURE

Disruptions in natural water flow, damage to riparian areas, damage to irrigation canals and structures, and contaminating pollutants that can leach into the natural Millcreek waterway that runs directly through the proposed area onto our property are of concern. The Ray Canal BIA irrigation system and infrastructures that are located throughout the entire proposed site are already in disrepair; wild horse herds and overstocking can lead to further damage. Additional stress by BLM horses on natural waterways and irrigation is a liability. During hot weather and to relieve pressure from insects, horses tend to congregate at water sources causing irreparable damage and bank destabilization that compromises waterways and the environmental quality of the water.

Water that flows directly into our property from the proposed site can be unpredictable. A current issue involving the natural waterway and irrigation is that BIA and tribal agencies use the natural Millcreek waterway as a conveyance for irrigation water and flood runoff, and our lands have been damaged by the over spilling and pushing of waters down Millcreek. The pictures below indicate a recent scenario in which waters were pushed through the proposed site area onto our personal property:

Our lands and waterways are compromised with bank erosion and sediment by this type of detrimental water flow practice as well as presenting a very real capacity for disease transmission

and destruction of fish habitat. In order to protect our land, we are actively working with irrigation to stop this practice and to limit how water is diverted down the natural Millcreek waterway for irrigation and for flood release measures. Given that conveyance in this waterway is an issue, complications of a wild horse sanctuary in this area is indeed a concern.

5. WILD HORSE HEALTH & SAFETY CONCERNS:

Throughout the years, we have had a broad experience and understanding of wild horse herds. As a contractor with Criswell Trucking, our trucks have had experience hauling wild horses off of Wyoming and Nevada desert lands to BLM facilities in Oklahoma. Additionally, my husband's family ranched in the Savery, Wyoming area and had range on the Red Desert/Rock Springs Grazing Association for several decades in which their cattle and sheep operation came into daily contact with wild horses in their natural habitat. These experiences offered a profound understanding of the grazing needs and the unpredictable behaviors of wild horses both on the open range and in captivity and of the unique management requirements of these animals. Management requirements for BLM horses demand intense attention, timely and experienced handlers, and wide-ranging lands with robust handling facilities. None of these exist at the proposed site.

Furthermore, we have an understanding of where these animals came from, and can attest that the swampy proposed area north of Lander is far from a healthy sanctuary for them. As a certified farrier with over 20 years of experience, my husband knows the ramifications of mismanaged horse hooves. A wild horse herd placed long term and wholly in the proposed area would be detrimental to the health of the animals due to the fact that the ground is not suitable year-around for equine hooves. Dry ground and conditions similar to the habitat the wild horses came from are more suitable.

6. LEASING ISSUES:

The proposed area is largely located on leases managed by the Bureau of Indian Affairs which are subject to BIA evaluations and tribal approval that can make renewal unpredictable. Past Wind River Indian Reservation leasing requirements prohibited subleasing, and lessees face having leases canceled by the BIA when they are not utilizing the lands as indicated when leases are signed and awarded.

To further add to the unstable leasing situation, the Shoshone and Arapaho tribes initiated leasing resolutions in 2012 and 2013 that specifically keep non-enrolled members of the Shoshone and Arapaho Tribes from leasing and from renewing leases on tribally owned and tribally majority-owned allotted lands. The project location map for the BLM site clearly shows BIA leases are involved, and this is an issue that needs addressed when procuring contracts for long-term placement of BLM horses and burros.

7. PROPOSED ECO-SANCTUARY HAS THE POTENTIAL TO DEVALUE OUR DEEDED LANDS & LIMIT THE USABILITY OF OUR LANDS:

Appraiser and realtor discussions confirm that our own deeded lands near the proposed site and that border the site may be devalued as a result of a horse and burro eco-sanctuary placement in our area (see attached letter from James Hursh- High Country Appraisals). Besides affecting water in our area, our lands on the real estate market would have a limited market buyer base if a wild horse eco-sanctuary were bordering our lands and become less sellable. Also, appraisals of our lands would be directly impacted which further damages our real property. Lower appraisals on our lands are an economic liability because lower appraisals can limit the funding we secure for operation costs and limit our refinancing opportunities.

Furthermore, 250 head of BLM horses and burros directly adjacent to our property would make our property less usable for the production of our registered performance quarter horses and the use of our lands for ranch work via horseback. Out of concern for our stock and our safety, our registered performance quarter horses will not be able to be pastured on the lands that border the proposed site and use of our own lands will be diminished.

Safety is a concern as herds of wild horses approach the fences or bust and run creating chaos as we go about our own business on our own property. In this regard, we are directly affected because our home is here. We live here, and naturally we desire to enjoy our property to the fullest without the impact of the impending situation. The proposed eco-sanctuary applicant does not reside daily at this location, so his family may not bear the adverse effects in which our family will be forced to live if an eco-sanctuary were approved for this area.

8. FURTHER ISSUES:

In addition to addressing our previously stated concerns regarding impact to the area, we would like the Bureau of Land Management to respond with policy-based mitigation and detailed planning for the following:

1. During drought and irrigation water shortage years, pasture will be compromised in the proposed site area, and the proposed applicant will be forced to provide feed for the BLM animals. The reservation already has a prolific weed problem and limited funding for weed control. We need assurance that our lands directly downstream from the site will not become overridden by foxtail and knapweed or other noxious weeds that may spread from the proposed site if non-certified feed is fed to the BLM horses and the pastures are overgrazed. Since the purchasing of poor quality feed for the BLM horses could adversely affect our lands, we want assurance from the BLM that the hay will be of certified quality so as to not proliferate the weed problem in our area?

2. Is the herd going to be non-reproducing? If so, what forms of fertility control will be utilized on the animals and is there any possible transference of those medications to my stock or my persons in any way via the waterways and irrigation water? How are fertility issues and births going to be handled should neighboring reservation-owned stallions come into contact with the BLM herd?

3. Aged, non-reproducing stallions, if not castrated in the first year, often continue to act as stallions and exhibit learned fighting and dominance behaviors. What limitations are in place for the castration ages of the BLM stock and what procedures are in place for unmanageable and unsafe stock in such a small area where bands are not allowed to naturally separate? Likewise, fertility implants in mares do not keep them from coming into to heat and exhibiting learned mare behaviors which can cause problems among herds as well. What policy-based procedures are in place to handle such situations as well as to protect the neighboring public and neighboring stock?

4. High Plains Power lines that provide electricity to my home and ranch are directly located throughout the proposed site. Given the nature of the compromised ground in the area, the poles could easily become compromised if BLM stock damages them. Adequate equine-proof protection of these poles will be a must to ensure there are no disruptions in electricity to neighbors.

5. What vaccinations will the animals have prior to coming to the area? What vaccinations and deworming programs will be in place while animals are located in the area? Who from the BLM will verify this takes place and how often?

6. Contamination from the BLM animals and from fertility protocols as well as direct impacts on our natural waterway, our irrigation waters, and irrigation infrastructures are a genuine concern since live water and irrigation water runs directly from the proposed property through our ranch. What policy-based assurances are in place to keep our water, our persons, our stock, and our lands safe?

7. What is the policy-based procedure for disposal of deceased animals? What measures will be in effect to investigate disease and quarantine disease, especially through sub-irrigated areas, natural waterways and other irrigation waterways?

8. How many years is the proposed grant going to remain in place and what terms and stipulations are applied to the management of the eco-sanctuary? What happens when the proposed applicant fails to meet or maintain the stipulations?

9. If problems arise with the proposed eco-sanctuary horses in any way that directly damages our property, our animals, our safety, or our ranching endeavors, what recourse will we have to recover our losses and what assurances do we have from the BLM that maintenance of the proposed herd and the maintenance of the fences and environment will be upheld?

10. Given the state of disrepair for all boundary fences in the area and the large number of contact points for neighboring stock, fencing standards must be more rigorous and be specifically for equines as opposed to cattle fencing. What measures will be in place?

Sincerely,

Tom Morrison Heather O'Neal-Morrison

Tom Morrison & Heather O'Neal-Morrison

HIGH COUNTRY APPRAISALS

JAMES HURSH
Wyoming Certified General Real Estate Appraiser permit No. 151
7003 Riverview Road
Riverton, Wyoming 82501
(307) 856-1543

Monday, March 3, 2014

Heather & Tom Morrison
189 Plunkett Road
Lander, Wy, 82520

RE: Effect of BLM Wild Horse/Burro Eco-sanctuary located adjacent located adjacent to the west boundary of the O'Neal and Morrison deeded acreage and leased Tribal land.

Dear Heather & Tom;

I have studied over the proposed plan by the BLM. I have also studied the proposed location of the "sanctuary" in proximity to land you folks own and land your mother, (Gayle O'Neal), owns. The map indicates the "sanctuary" would be located adjacent to land with ownership interest by each of you. Land use in the general neighborhood of your property is primarily hobby ranch use, (up to 160 acres), with some larger economic ranch use type properties noted. If I had an assignment to appraise your property, I would first need to determine the Highest and Best Use of the property. Sales indicate that premiums are paid for hobby ranches ranging in size from 40 to 160 acres. The following are factors that influence the values of hobby ranches:

1.) Location in the close proximity of Lander, (within 10 miles).
2.) Access. Your properties have both legal and paved access.
3.) Scenic/wildlife amenities. I would consider your property above average. You are located within the close proximity of the Wind River Mountains offering an above average view of the Mountains. Scenic amenities strongly influence the value of hobby ranches.
4.) Privacy, (no built-up subdivisions located in the close proximity).
5.) Open Creek frontage, (Mill Creek intersects a portion of your property).
6.) Location/land/water conducive to having livestock. People paying premiums for hobby ranches may have substantial investments in registered livestock. Having a location that offers no outside interference to livestock ownership is very important to buyer motivation.

In concluding on a Highest and Best Use for your property, you meet all the criteria above and I would conclude that dividing the property into tracts in the 40 to 160 acre size range for Hobby Ranch use would be the Highest and Best Use of the properties. Portions of your properties are now in this size range.

In summary, in appraising your property, the foundation of my analysis would be that the Highest and Best Use of your property would be for Hobby Ranches. It is my opinion that the location of the proposed "sanctuary" adjacent to your property would have a negative effect on your property values due to the following:

1.) Scenic Amenites: The view from your properties to the mountains is west. Hobby ranch buyers typically seek properties that offer an open/scenic view. I feel that a high concentration of wild horses on the adjacent property to the west would detract from the scenic amenities your property now offers.
2.) Wildlife Amenities: It is unknown what, if any, effects the concentration of a large number of wild horses on adjacent property may have on the wildlife population in the immediate neighborhood, but it would be my guess that it would be a negative effect.
3.) Creek Frontage: You now have good quality creek frontage with clear water. Without proper management of the wild horses located "upstream" from you, I would think that the probability would be high that the creek quality would be affected on your property.
4.) Quiet Enjoyment for Livestock Ownership: This item I feel is very significant for the valuation of your properties. I would feel this number of wild horses would test most fences and I would be very reluctant to have prized livestock located adjacent to this "sanctuary". I would also be very reluctant to have my family or friends ride horses on this acreage due to the fear of an older "proud cut" horse getting into the properties and putting them in a dangerous position.

Items 1-4 above are negative factors affecting property value for hobby ranches. To conclude on a percentage discount to your overall property value due to the influence of the "sanctuary", I would need to "pair" sales to provide market evidence. This is involved and would create an expense for you, but I can certainly do it. I have seen access issues alone create 50% to 60% decrease in value for hobby ranches. You don't have access issues, but you do have the issues as stated in items 1-4. In summary, I would anticipate a discount in value to your properties, due to the proposed "sanctuary", in the 20% to 30% range. "Pairing Sales" would provide market evidence and would provide the final indication of an overall discount.

I hope this discussion has been informative to you, and it is my firm opinion that the proposed location/use of the BLM sanctuary would be negative for the overall value of your properties.

If I can be of further assistance, please free to contact me.

Sincerely,

James Hursh
Wyoming Certified General
Real Estate Appraiser
Permit #151

QUALIFICATIONS OF APPRAISER

JAMES HURSH

AFFILIATIONS:

Licensed Real Estate Broker – State of Wyoming
Canidate Member of the American Society of Farm Managers and Rural Apprisers
Past Member of the Riverton Soil Conservation District Board (20 yrs)
Wyoming Certified General Real Estate Appraiser, Permit #151

EDUCATION:

B.S. Degree in Ag-Business from the University of Wyoming, 1973.
Professional training and education in cooperation with the American Society of Farm Managers & Rural Appraisers. Trained under John Froma, (MAI), from 1986-92. Private practice from 1993 to present.
American Institute of Real Estate Appraisers and Society of Real Estate Appraisers.
A-10 – Fundamentals of Appraisal – American Society of Farm Managers & Rural Appraisers.
A-20 – Principles of Rural Appraisal – American Society of Farm Managers & Rural Appraisers.
A-30 – Advanced Rural Appraisal - American Society of Farm Managers & Rural Appraisers.
A-45 – Certification School - American Society of Farm Managers & Rural Appraisers.
Capitalization Theory and Techniques Part A – American Institute of Real Estate Appraisers.
Cash Equivalency Seminar - American Society of Farm Managers & Rural Appraisers.
Sales Analysis Seminar - American Society of Farm Managers & Rural Appraisers.
Cost Approach Seminar - American Society of Farm Managers & Rural Appraisers.
Professional Practice – Society of Real Estate Appraisers.
Highest & Best Use Seminar - American Society of Farm Managers & Rural Appraisers.
A-12 – Code of Ethics, (1995) - American Society of Farm Managers & Rural Appraisers.
Uniform Standards of Professional Appraisal Practice – 1995 - American Society of Farm Managers & Rural Appraisers.
Revisions & Update to USPAP - American Society of Farm Managers & Rural Appraisers.
Ranch Appraisal Seminar – 1995 – American Society of Farm Managers & Rural Appraisers.
Rural Residential Properties – 1996 – American Society of Farm Managers & Rural Appraisers.
Appraising Agricultural Chattles – 1996 – American Society of Farm Managers & Rural Appraisers.
Eminent Domain and Condemnation Appraising – 1997 – Appraisal Institute.
Uniform Standards of Professional Appraisal Practice – 1998 – The Chicopee Group.
Litigation Skills for the Appraiser – 1998 – The Appraisal Institute.
Uniform Standards of Professional Appraisal Practice – A-12 – ASFMRA – January 2000
Uniform Standards of Professional Appraisal Practice – Appraisal Institute – January 2001
Advanced Sales Confirmation – March 2001 – American Society of Farm Managers and Rural Appraisers
National Uniform Standards of Professional Appraisal Practice Course – Appraisal Institute – January 2003
Income Approach / Discounting & Leases – American Society of Farm Managers and Rural Appraisers – May 2003
National Uniform Standards of Professional Appraisal Practice Update
ASFMRA – Highest & Best Use Course (A-29)
USPAP Update
Appraisal Issues and Client Relations Seminar

Education Continued:

Evaluating Commercial Construction Seminar
Uniform Agriculture Appraisal Report Ag Ware Course
ASFMRA – USPAP Course (A 114) – Billings, Mt. 2/1010
Appraisal Institute – Valuation by Comparison – Casper, Wy – 1/2010
Land & Site Valuation – McKissock – 7/2010
Wind Power Seminar – ASFMRA – Cheyenne, Wy – 7/2010
ASFMRA – Panel Discussion with Industry Leaders and Tour Wind Mills – Cheyenne, Wy – 7/2010
Dirty Dozen – McKissock – 8/2010
7 hour National USPAP Course – ASFMRA – Billings, Mt – 2/2010
ASFMRA Business Ethics Refresher – Webinar – 11/22/11
Uniform Standards of Professional Appraisal Practice – 1/2012 – Casper, Wy.

EXPERIENCE:

First Interstate Bank, Riverton, Wy – Commercial & Ag
Mr. Allan Van Horne – Attorney at Law – Denver, Co
Wyoming National Bank – Riverton/Lander – Commercial, Farm & Ranch
David L. Koerwitz, CPA – Thermopolis, Wy – Ranch Property
Farm Credit Service – Wy – Farm/Ranch
City of Riverton – Airport Lease Property, Commercial Land
Federal Deposit Insurance Corporation – Denver, Co
Farm Service Agency – Casper, Wy – Farm/Ranch
Union Pacific Resources – Ranch Property – Sweetwater & Unita Counties
Resolution Trust Corporation – Commercial & Mobile Home Parks
State of Wyoming – Public Range Land
Key Ag Credit Corp. – Ranch Property
First National Bank of Omaha, Nebraska – Farm Property
Wyoming Highway Department – ROW
Verex Mortgage Corporation – Bed & Breakfast
Tom Fasse, Attorney at Law – Riverton, Wy
Flagstone Ranch – Lander, Wy
Jay Vincent – Attorney – Riverton
Davison Brothers, Inc – Ranch – Fremont County
Rench Livestock – Farm – Riverton
Western Nuclear, Inc – Range Properties
Phillip Heinicke – Boulder, Co – Fremont County Ranch Properties
Stewart Ranch – Dubois, Wy
Winter Law Firm – Estate Appraisals – Farm/Ranch
John Vincent – Attorney – Estate Appraisals – Farm/Ranch
Vicki & Dick Buholz – Dubois Ranch Properties
Dennis Sun – Sun Ranch Properties – Jeffrey City, Wy.

EXPERIENCE CONTINUED:

Vance Benson – Farm Property – Lakewood, Co
Community First National Bank – Riverton/Lander – Farm/Ranch Properties
Bayard Fox – Dubois Ranch Property
Duncan Finlayson – Fremont County Farm/Ranch properties
Fremont Miller – Crowheart Ranch property
John Hornbeck – Elk Mountain Ranch Property
Charles Crofts – Crofts Sheet Co – Fremont County Ranch Properties
Rollie Cox – Lander Farm Property
Ben Iterian – "Mitten Ranch" – Bison Basin – Fremont County
Bureau of Land Management – Big Horn Mountain Ranch Property
Roger Strube – Strube Ranch Property – Lander, Wy
Shoshone Tribes – Farm/Ranch and Commercial Properties
Jim McIntosh Estate – 46 Ranch – Jeffrey City, Wy
Ron Hanson – Lander Convienence Store and Riverton Office/Shop
Becky Enos – Lander Ranch Property
Jennifer McIntosh Ranch – Jeffrey City, Wy
Three Quarter Circle Ranch – Tony Malmberg – Lander, Wy
Muir, Voight and Clark, CPA's, Weiser, Idaho – Lander, Wy commercial properties
Sally Hill – Riverton Rentals – Commercial/Industrial property
Joyce Stultz – Residential, commercial and agricultural properties in Riverton and Lander, Wy
Bank of Jackson Hole – Dubois Branch – Riverton farm property
Lowell Hansen – Sioux Falls, S.D. – Pinedale Dude Ranch
Mike Fjetland – Crooked Creek Ranch – Dubois Recreational Property
Wells Fargo Bank – Pinedale Ranch Property
First Interstate Bank of Riverton – Farm, Ranch and Commercial Properties
Pat Hancock – Lander/Sweetwater Ranch Property
Peckerman & Klein – Attorneys – Milwaukee, Wisconsin – Stanwick Rangeland
Brian Kahin – Conservation Easement – Dubois, Wy
Brad Eastman – Dubois Recreation Property
Wind River Development Fund – Commercial Building at Fort Washakie
Mr. HayDen Kayne, P.C., Colorado Springs, Co – Farm land at Ethete, Wy
John Finley – Finley Ranch – Dubois, Wy
Riverton Fire District – Commercial Land – Riverton, Wy
Todd Herreid – Farm Land – Farson, Wy
Wyoming Department of Transportation – Residential Properties – Dubois, Wy
Myron Jarvis – Farm property at Riverton and Ranch property at Moneta
Mike Jarvis – Farm property – Riverton
Curt LeClair – Farm – Ethete, Wy
LeRoy Long – Farm – Riverton

EXPERIENCE CONTINUED:

Victor Mack – Farm – Farson, Wy
Jack McMurry – Farm – Farson, Wy
Rod Mines – Farm – Farson, Wy
Gary Reiter – Rock Springs – Rangeland
Alan Stanwick – Rangeland
Louis Twitchell – Farm/Ranch property at Fort Washakie, Wy
Jackson State Bank – Recreational property – Dubois, Wy
Farm Service Agency – Farm/Ranch appraisals in Western Wyoming
Riverton Memorial Hospital – Commercial land in Riverton, Wy
Dubois Fire District – Firehall and lots in Dubois, WY
Bureau of Land Management – Ranchland on the south end of the Big Horn Mtns
US Bank of Billings, Mt – Rangeland south of Shoshoni, Wy
Metropolitan Life Ins Co and Met Life Bank – Dubois Ranch Property
Philp Sheep Co – Farm/Ranch property – Fremont County, Wy
Bruce Gallinger – Ranch Property – Lander
Hugh Jones Estate – Farm/Ranch property – Lander
Riverton School District and State of Wyo - vacant land for gradeschool in Riverton
Mike Messinger & Randy Royal – attorneys – Basin, Wy farm property
Troy Jones – Farm/Ranch property – Farson, Wy
Wil Broadbent (Evanston) and Dave Darley (Salt Lake City, Utah) – farm property
Mark Condict – Dubois, Wy Ranch/Recreation property
City of Riverton and State of Wyoming – Prison Farm property for commercial expansion
Mr. Robert Cheatham – Fallbrook, California – Dubois, Wy ranch property
Edna Bringolf – Sand Draw ranch property
Bureau of Indian Affairs – Wind River Reservation Land
National Bank of Commerce – Pampa, Texas – Lander Commercial property
Tradition Capital Bank – Edna Minnesota – Pinedale Ranch property
Metropolitan Life Ins Co – Dubois, Wy ranch property
Burk Johnson – Crowheart, Wy ranch property
Lori Stelljes – Fort Worth, Texas – Dubois, Wy ranch property
Bob Letner – Moneta, Wy range property
Matt Miller – Pinedale, Wy ranch property
Wyoming Medical Center of Casper – Dubois Recreational property
Stetson Engineering – Riverton Commercial property
Kathy Ruby – Lander residential, commercial and farm properties
Rich Pingetzer – Riverton farm property
Steve Pince – Riverton farm property
Bob Medow – Riverton farm/Feedlot property
The Nature Conservancy – Split Rock Ranch – Jeffrey City, Wy

EXPERIENCE CONTINUED:

Key Bank National Association – Thomas Parker Ranch – Dubois, Wy
Larry Hume – Laramie Mountain Ranch
Larry Hume – Powder River Ranch property
Chris Brown & Bill Simpson, attorneys – Lovell Ranch property
Joe LoCicero – Easton, Penn. – Fremont County Range Properties
First Bank of Evanston, Wy – Riverton farm
Charlie Griffin – Griffin Bros Ranch – Riverton, Wy
Bill Crump – Lander Ranch property
Family Tree Oil Corp – Lakewood, Co – Fremont County Ranch property
Gale Gossett – Office Center – Riverton, Wy
Bill Hancock – Fremont County Ranch
High Plains Power – easement over reservation
Bill Jennings – Jennings Farm Estate – Riverton
Louise MacKenzie – Dubois Dude Ranch
George Pingetzer – Riverton/Highland farm/ranch property
Rod Smith – Gillette, Wy – Ranch
Stella Taylor – Danielle, Wy – Ranch
Old Republic Title Co. – Golden Colorada – "Before & After" Appraisal for litigation purposes
Ron Fuller – Lander Ranch – Life Estate, Litigation
LHS Split Rock Ranch & Schiff Farms – Split Rock Ranch – Jeffrey City, Wy.
Jamie & Chris Weese – Farson, Wy Farm Property

February 28, 2014

RECEIVED
- 3 2014
LANDER FIELD OFFICE

Scott Fluer, Wild Horse Specialist
Rick VanderVoet, Field Manager
BLM Lander Field Office
1335 Main Street
Lander, Wyoming 82520

RE: Proposed Double D Ranch Wild Horse Eco-sanctuary 4700 (WY050)

I would like to take this opportunity to comment on the proposed Wild Horse Eco-sanctuary on the Double D Ranch site. I own and live on property adjoining the Double D Ranch lands. My family's ranch lands share one and a half mile of fence line (nearly the entire eastern and northern borders) with the Double D Ranch. I have been a resident at this location for 42 years and along with my children have maintained a productive and viable ranch operation during this time. I am opposed to this proposed Wild Horse Eco-sanctuary and feel the proposed action will have considerable negative impacts. The following issues are in need of in-depth analysis:

I: ISSUES AFFECTING THE ENVIRONMENT

1. The only source of year round water on the Double D Ranch is Mill Creek. Mill Creek passes through the Double D Ranch and enters my property. Erosion of the creek banks by large numbers of horses could be a reality if this property were to become a wild horse eco-sanctuary. Degradation of the creek banks and wetland areas surrounding the creek could damage surrounding ecologically critical areas. Traditionally, reservation peoples have fished this creek and have caught native trout species. Ducks, geese, sand hill cranes and other water fowl nest and feed along the creek and this area is also home to muskrat, mink and other mammals. The general health and well-being of these riparian areas could be adversely impacted.

2. During irrigation season damages to irrigation infrastructure can occur. Excess irrigation water from the Double D Ranch enters my property through various drainages. Horses treated with hormones grazed on these irrigated pastures could contaminate the water with residuals and/or expose my livestock to disease or have other negative impacts.

II: ISSUES AFFECTING THE SAFETY AND WELFARE OF THE WILD HORSES

1. SWAMP LAND HABITAT: It is a well-known fact that continued wet conditions are undesirable for horse's feet and under such conditions extra care and maintenance are required to maintain healthy feet. In the case of wild horses proper foot care will be difficult and a problem that

these horses have not been exposed to in their desert environments. I have personally experienced the boggy conditions on the applicants land when driving a four wheeler across it and I would be reluctant to ever ride a horse across it for fear of bogging down. Due to the swampy conditions, major mosquito, deer fly, horse fly and other biting insect populations are particularly troublesome to horses. It is not uncommon to see horses running wildly in efforts to get away from the biting insects in this area. I have witnessed horses getting tangled up and severely cut by fences while trying to get away from the torment of biting flies. West Nile Fever infections can be prevalent here as well.

2. STRAY HORSE ENCOUNTERS: I have lived here for 42 years and it is common for unmanaged horses to stray onto the reservation roadways and other lands. Horses in general are part of the native culture and are given some latitude as to free range existence. I have personally experienced numerous instances of stallions (and other gender horses) making their way through several fences and pastures and coming into contact with neighboring horses. These happenings are not rare instances but common occurrences. I have witnessed this scenario on Double D Ranch properties as well. Gates are often left open, fences fall into disrepair and a large amount of idle land where native unmanaged horses are allowed to be are all commonplace occurrences. I experienced two incidents last summer of errant stallions entering my property. In one instance a stallion from over a mile away crossed at least three fences, jumped the fence into my property, impaled itself on a steel post and perished from the injuries. Horses are naturally drawn to other horses and when strange horses of all genders encounter each other across a barbed wire fence the risk of injury is high. There will be many contact points for the wild horses and that could impact their safety and well-being.

3. RESIDENTIAL/HOUSING AREAS: The Plunkett Field Road housing area borders a portion of the proposed site and a large stray and roaming dog population could be a source of danger to the safety and welfare of the wild horses. They could be forced into a fenced corner with no escape except over and through the barbed wire. More reservation housing is being planned in the future which could have increased negative effects for the long term care and management of the wild horses.

4. B.I.A. AND TRIBAL POLICIES REGARDING RESERVATION LAND LEASES: Of the 900 acres that the applicant is proposing for this eco-sanctuary only 200 are deeded acres leaving 700 acres that are reservation owned leased lands and there is no guarantee that the present lessee will maintain control of these properties. Leases are generally written for 5 year periods at a time and are subject to renewal at the end of each lease period. Leased lands on the reservation are generally leased in specific parcels and involve numerous different individuals. Each of these different allotments is generally fenced which means there are numerous interior fences on the proposed eco-sanctuary site. Negotiating the gates and passage to these lands could be troublesome and perilous to wild horses. Further, the BIA views the practice of grazing livestock that is not "wholly owned by the lessee" as subleasing which is not allowed. With regards to six of the leases the applicant has included in the wild horse eco-sanctuary acreage (approximately 420 acres) the lessee must acquire at least 50% of the existing landowners to sign an agreement to allow the proposed subleasing practice and some of these leases are owned by 100 to 200 heirs. This procedure has not taken place.

5. JURISDICTIOIN AND LIABILITY: The BIA also indicated that they already deal with numerous horse related problems and neither the B.I.A. nor the tribes are in favor of this proposal. Non-enrolled peoples are not allowed on tribal lands. Trespass laws and legal jurisdiction could have serious negative impacts. As to stray animals entering Double D Ranch properties "fence out" laws apply. Jurisdiction issues could have impacts for visitor/wild horse viewing and increased liabilities to the proposed applicant and the BLM.

III: ISSUES THAT DIRECTLY AFFECT MY LAND AND RANCH OPERATION:

1. FENCE REPAIR AND MAINTENANCE: The boundary fences have been in existence for at least 60 years and are in a state of disrepair. Having lived here for 42 years, I have firsthand knowledge and experience with neighborly relations in our ranch community. Prior to 2004 the Double D Ranch properties were owned & operated by Hornecker Livestock who maintained excellent fences and we had few instances of livestock getting through the fences. This ranch property has changed hands twice in the last ten years and fences have become run down. I am experiencing higher incidences of livestock crossing the boundary fences. Although all shared boundary fences are in need of repair, much of the fence line between our properties is located on sub irrigated and swampy land that is particularly difficult to maintain. The wooden brace posts and corners are rotting and the steel posts are rusting off, leaning and easily pushed over due to the swampy conditions. Additionally, much of the barbed wire is weak and rusty. Very little in fence material or fencing effort to repair these boundary fences has been put forth by the present Double D Ranch operator. During the past 3 or 4 years, I have witnessed overgrazing of cattle on that ranch property. This has caused livestock to aggressively push and lean on the fences while reaching for grass. I have gone to much expense to replace posts and repair this fence line. I have experienced numerous yearly instances of Double D Ranch livestock crossing the fences onto my property. On many occasions it has been whole herds not just one or two head and it has involved horses and cattle. It is difficult to maintain the fences from my side because my access to the fence line is limited by existing creeks, canals and swamps that are impossible to drive a vehicle across in order to get repair materials to the fence line. I feel that I will be put in an unfair and compromised position as to fence maintenance and repair.

2. DIFFICULTIES OF CONTACT WITH APPLICANT: The proposed applicant does not live on site and is often unaware of day to day happenings at the proposed location. He is often out of town and hard to contact. When the proposed applicant is reached and informed that some of his animals have broken the fence and entered my property, he indicates he'll send someone and seldom deals with the problem himself. The applicant relies on hired help to look after livestock and these employees have often turned a blind eye to straying animals. On numerous occasions the hired help has failed to recognize the urgency of the situation and failed to remove the animals in an expedient manner. There have been instances of the Double D Ranch cattle herd allowed to be on my property for days at a time. It becomes necessary for me to chase them out and send someone to rebuild the fence as no one from that side of the fence was forthcoming.

3. PROPERTY VALUES AND USE OF MY PROPERTY: An enterprise such as a Wild Horse Eco-

Sanctuary and the known related problems have the potential to devalue deeded land owned by myself and my children. There is also the potential to limit the use of our pasture lands for our own horses. At one time we had a small number of brood mares and a stallion that we ran on our property adjoining the Double D Ranch property. This would be entirely out of the question if the proposed action were to be enacted. My children have raised and pastured horses on land adjoining the Double D Ranch and have encountered many problems. Mill Creek flows through our deeded land and any contamination of this creek will affect our use and enjoyment of it. The prospect of a large number of wild horses on property adjoining my lands will definitely have a negative impact on my ranch operations and land values. Encroaching sight seers or non-authorized persons entering upon my property will be met with zero tolerance.

IV: IN CONCLUSION:

1. Failure to protect Mill Creek would indicate a lack of a holistic approach to conserve the environment.

2. Based on information I have gleaned from the BLM, BIA and the NRCS, it would seem that the plan for the Double D Ranch Wild Horse Eco-sanctuary is questionable and unrealistic. The 900 acres that is being proposed for this purpose is not factual. It must be broken down into deeded acres and lease acres that are useable for subleasing. The true acreage for use as a wild horse sanctuary could possibly be only 480 acres. As to the lease situation, the possible violation of federal regulations exists and the lack of lease guarantees impacts the reality of long term care and management of the wild horses.

3. Some of the acreage is under an NRCS fencing contract with a grazing plan in place based on the grazing of cattle. If the applicant's personal cattle are to be grazed on the leased allotments that have subleasing restrictions, that will further complicate and impact the fencing and areas on the ranch where wild horses can be.

4. It is totally unrealistic to speculate that up to 250 head of wild horses plus additional cattle could be run on this proposed site. That is 3.60 acres per horse and that is not sustainable in the long term. Having lived here for 42 years during which time I have maintained a successful cattle operation, I know and understand the carrying capacity of these properties. I witnessed the overgrazing of cattle by the applicant on a short term basis. Further information should be considered based on verification of production and interviews with individuals that have grazed livestock under Double D Ranch management. The opinion of a third party, disinterested, certified ranch appraiser should be sought. Drought and lack of adequate pasture will require supplemental feeding of hay. Given the high cost of hay the result will not ensure a cost effective program for the wild horses or the applicant.

5. Many existing hazards impact the safety and welfare of the wild horses. This proposed site can hardly be described as a natural setting. The use of fences, which would be necessary on this location, restricts their free roaming nature. The biting insect problems, close proximity to housing, roaming dogs and other horses, relatively small pastures and numerous fences involved are inhumane and defeat the purpose of long term care in a natural setting.

6. The fact that the applicant has an NRCS fencing contract based on cattle management, has connections to a fencing company and will undoubtedly seek to be paid to build boundary fences could be construed as a conflict of interest. Has the credentials and performance records of work done by this fencing company been examined? Given the uncertainty and need for clarification on the reservation leases, the questionable fencing issue, inflated carrying capacity claims, the whole proposal (as stated by the BLM) to hold up to 250 wild horses on this 900 acre site seems to be based on shaky ground and at the very least not conducive to sound stable long term care and management of the wild horses.

7. Very little information has been provided to me and I have numerous questions that must be answered. I must insist upon being informed of any planned or imminent action. As for impacts to my ranch properties and operation, I feel that strong fences are absolutely necessary. I request the placement of a 6-wire boundary fence to be at least 5 foot high be constructed and the placement of an additional(electric or otherwise) fence 10 feet inside the applicant's property and off the boundary fence to keep the wild horses from encroaching upon my property. I will pursue all avenues available to me to protect my property, pasture, hay supplies, livestock and horses. I will demand immediate removal of the trespassing animals and all damages be taken care of.

As a taxpayer and a concerned citizen, I feel it is my duty to call into question all circumstances at play here. Are there unrealistic components, conflicts of interest or other misconceptions that would predispose the overall soundness of the proposal resulting in potentially inevitable economic and ecological repercussions?

Thank you for the opportunity to comment and I appreciate consideration of the information I have provided.

Sincerely,

Mrs Gail O'Neal

Mrs. Gail O'Neal

O'Neal Ranch
90 Mill Creek Road
Lander, WY 82520

Rick VanderVoet, Field Manager
BLM Lander Field Office
1335 Main Street
Lander, WY 82520

RE: 4700 (WY050)

RECEIVED
MAR - 4 2014
LANDER FIELD OFFICE

Lander Ecosanctuary EA, BLM_WY <blm_wy_lander_ecosanctuary_ea@blm.gov>

Ecosanctuary

Jeri Trebelcock <jerit@wyoming.com> Tue, Mar 4, 2014 at 9:08 AM
To: BLM_WY_Lander_Ecosanctuary_EA@blm.gov

Attached are the comments provided by Popo Agie Conservation District for the Double D Ecosanctuary.

Thank you

Jeri Trebelcock

Popo Agie Conservation District

Ecosanctuary comments.pdf
677K

Popo Agie Conservation District

221 South 2nd, Lander, WY 82520
Phone: 307-332-3114 FAX: 307-332-3855

March 4, 2014

Scott Fluer
BLM Lander Field Office
1335 Main Street
Lander, WY 82520

Dear Scott:

On behalf of the Board of Supervisors for Popo Agie Conservation District we would like to thank you for the opportunity to provide comments on the proposed Double D Ranch Wild Horse Ecosanctuary.

We support the opportunities the Ecosanctuary may provide to promote the local economy, wild horse awareness, and opportunity for the public to view wild horses. We encourage the BLM to work with the landowners to develop a grazing strategy for the horses that considers water quality and the long term health of the sub-irrigated and irrigated lands that will be utilized in the facility.

While supporting the Double D Ranch application we feel strongly that long term holding facilities are not a sustainable, long term solution to manage wild horses. To quote Gary Hughes Palmer, Chair of the Committee to Review the Bureau of Land Management Wild Horse and Burro Management Program … "In light of the charge of our committee and in the course of our public engagement, it is clear that the status quo of continually removing free-ranging horses and then maintaining them in long-term holding facilities, with no foreseeable end in sight, is both economically unsustainable and discordant with public expectations. It is equally evident that the consequences of simply letting horse populations, which increase at a mean annual rate approaching 20 percent, expand to the level of "self-limitation" – bringing suffering and death due to disease, dehydration, and starvation accompanied by degradation of the land – are also unacceptable."

We would ask that BLM not lose sight of long term solutions to include:

- Timely gathers to remove excess wild horses
- Implement long-term fertility control to manage population growth
- Humanely put down animals for which no adoption demand exists

Thank you for providing us the opportunity to provide comment.

Sincerely,

Tim Wilson
Chairman

Lander Ecosanctuary EA, BLM_WY <blm_wy_lander_ecosanctuary_ea@blm.gov>

Ecosanctuary

1 message

Deanna Rowan <dkrowan02@yahoo.com> Wed, Feb 12, 2014 at 1:41 PM
To: BLM_WY_Lander_Ecosanctuary_EA@blm.gov

I am a long-time (over 50 years) equine advocate including breeding, training, exhibiting, transporting, and cruelty investigations. I do support the proposed ecosanctuary in Lander, WY for up to 250 wild horses as an alternative to current BLM holding facilities that provide an unnatural environment for the horses. My position on this issue is predicated on this ecosanctuary being operated in a humane manner by compassionate horse persons who are knowledgeable about the needs and care of wild horses. I believe the facility should be monitored by BLM on a sensible timeline to ensure the horses are not subject to exploitation or neglect.

Deanna Rowan
Chapel Hill, NC
"The wind of heaven is that which blows between
a horse's ears"...Arabian proverb

Lander Ecosanctuary EA, BLM_WY <blm_wy_lander_ecosanctuary_ea@blm.gov>

Scoping Comments Double D Ranch Ecosanctuary

1 message

Suzanne Roy <sroy@wildhorsepreservation.org> Tue, Mar 4, 2014 at 8:08 PM
To: BLM_WY_Lander_Ecosanctuary_EA@blm.gov
Cc: Neda DeMayo <neda@returntofreedom.org>, Deniz Bolbol <deniz@wildhorsepreservation.org>

ATT: Scott Fluer, Wild Horse Specialist
BLM Lander Field Office
1335 Main Street
Lander, WY 82520

Dear Mr. Fluer:

These comments on the scoping for the *Proposed Double D Ranch Wild Horse Ecosanctuary* Environmental Assessment (EA) are submitted on behalf of the American Wild Horse Preservation Campaign (AWHPC) and our parent organization Return to Freedom.

AWHPC is dedicated to preserving the American wild horse in viable free-roaming herds for generations to come, as part of our national heritage. Our grassroots efforts are supported by a coalition of over 60 historic preservation, conservation, horse advocacy and animal welfare organizations.

Return to Freedom, founder of the AWHPC, is a national non-profit dedicated to wild horse preservation through sanctuary, education and conservation. Return to Freedom operates the American Wild Horse Sanctuary in Lompoc, CA.

We urge the Bureau of Land Management (BLM) to include the tenets outlined below as a part of the Proposed Action in the EA in order to ensure that the public has the opportunity to understand the operational , managerial and fiscal aspects of the proposed facility. In addition, it is essential that the public be provided with ample opportunity to visit the proposed BLM-contracted facility where wild horses will be kept. Finally, if the proposed project is to truly fulfill the concept of "ecosanctuary," then it must keep wild horses under as natural conditions as possible so that the public may be afforded a true educational opportunity. The following are specific issues that must be required the Cooperative Agreement (CA) for operation of the Double D Ranch as a BLM "ecosanctuary"/long-term holding facility. This is necessary to ensure that the public has access to all information about all aspects of the operation of the proposed facility, which will be operated with public, taxpayer dollars.

1. **Operational Management**

All plans for management of wild horses at the Double D Ranch must be made publicly disclosed and analyzed in the EA.. Given that the Proposed Action is to allow up to 250 wild horses to be kept at the Double D facility, it is imperative that all plans for the management, treatment and monitoring the condition of the animals be made available to the public. Protocols for feeding, monitoring, providing routine and acute veterinary care, and other husbandry practices (foot trims, etc.) should be included in the EA. Without this information, the impacts of the Proposed Action on the wild horses to be housed at the Double D Ranch cannot be analyzed.

In addition, the Proposed Action or CA must include broad public disclosure requirements for all

information related to care, feeding, maintenance and other relevant information regarding wild horses at the facility.

2. **Public Visitation**

Currently, the description of the Proposed Action states that "the ecosanctuary would be publicly accessible while providing ecotourism and educational opportunities " However, if this is facility is to differ from other BLM Long-Term Holding (LTH) facilities, public visitation and observation of wild horses held at the Double D Ranch must be guaranteedfor *a minimum of* 20 days per month. Visitation could be made available by pre-arranged appointments. Public visitation should be allowed on both weekends and weekdays in order to facilitate public visitation. A calendar with public visitation opportunities should be made available at least three months in advance in order to allow members of the public to make travel arrangements to visit the wild horses at the Double D Ranch which is remotely located. The CA and Proposed Action must ensure flexibility with regard to public visitation in order to encourage the public to visit and understand the operations of the taxpayer-funded facility.

As stated above, without regular visitation hours open to the public, the difference between the proposed facility and existing LTH facilities will be negligible. There is a great deal of public controversy regarding the lack of public access to current BLM LTH facilities. It is essential that the BLM begin to create CAs for "ecosanctuaries" or contracts with any holding facilities require that guarantee greater transparency and public access/visitation opportunities.

3. **Financial Disclosure**

The Proposed Action or CA must require full financial disclosure regarding the proposed Double D Ranch wild horse ecosanctuary. Financial disclosure requirements for the for-profit venture should meet or exceed financial disclosure requirements under IRS rules for not-for-profit organizations. The American public has the right to know how tax dollars are being spent in BLM public/private partnerships, such as the one outlined in the Proposed Action, and it is incumbent upon the BLM to ensure that all CAs or contracts include such specific disclosure requirements. The financial aspect of the Proposed Action is especially of interest and importance given that the BLM is claiming that this Proposed Action is intended to save tax dollars. The EA should review and disclose all financial arrangements in order to analyze, and provide the public with the opportunity to review and the economic impacts of the proposed action.

4. **Natural Conditions - True Ecosanctuary**

Finally, it must be noted that the EA falsely labels the Proposed Action as a wild horse "ecosantuary." The word "ecosanctuary" implies that wild horses would be living naturally in their ecosystem; however, nothing could be further from the truth in this instance. In reality, the horses who will be sent to Double D are captive-held wild horses; indeed, if only geldings are shipped to the facility, the horses will no longer exhibit wild, free-roaming behaviors that they once exhibited when they were in-tact stallions. Therefore, the word "ecosanctuary" should not be used for this holding facility. True wild horse ecotourism outfitters, which take the public to view wild, free-roaming horses living in Herd Management Areas (HMAs), have previously outlined to the BLM the inherent problems and false advertisement of using the word "ecosanctuary" for LTH facilities that are open to the public.

If BLM truly wants to accurately label the Double D Ranch as an ecosanctuary, then the EA must consider an alternative for maintaining wild horses in natural social bands, using either PZP fertility control or chemical vasectomy as a method of controlling reproduction without impacting natural behaviors. This model has been pioneered by **Return to Freedom,** at its American Wild Horse Sanctuary in Lompoc, California. Maintaining wild horses within their natural social structures under conditions that allow them to exhibit their natural social behaviors is the only way for the BLM to educate the public about the true nature of wild horses and to accurately

live up to the label of an "eco-sanctuary."

Thank you for your consideration.

Suzanne Roy

AWHPC

PO Box 1048

Hillsborough, NC 27278

sroy@wildhorsepreservation.org

919-697-9389

Suzanne Roy, Director
American Wild Horse Preservation Campaign
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Join us on Facebook
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Lander Ecosanctuary EA, BLM_WY <blm_wy_lander_ecosanctuary_ea@blm.gov>

Ecosanctuary Scoping Comments

1 message

rsga <rsga@wyoming.com> Tue, Feb 11, 2014 at 10:58 AM
To: BLM_WY_Lander_Ecosanctuary_EA@blm.gov

Scott Fluer: This is interesting proposal as one of the tools for Wyoming to get on top of the wild horse problem for unadoptable wild horses. At first glance at the proposal it appeared strange for BLM to take wild horses off BLM land and place them on Tribal Lands at a time when many tribes are overstocked with domestic and feral horses. Perhaps the arrangement with Double D will be workable for BLM, Double D, and the Tribes.

Having some experience with similar facility on Eagle Butte Reservation in South Dakota in late 1980's. Arranged for by Washington Office, and administered by Wyoming, the administration and contract were directly with Tribal Council, and addressed role of Tribal Officers and Veterinarians. My concern on the scoping of this Ecosanctuary is administrative rather than environmental, and for BLM to have clearly defined lines of authority to investigate complaints and escaped horses on Tribal Lands. Based some of the phone calls I receive from eccentric horse advocate interest groups, security should be a paramount interest with this facility. Therefore a need to supplement contractor for additional security expense in cooperation with Tribal Police should be considered

Donald M. Schramm.

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Lander Ecosanctuary EA, BLM_WY <blm_wy_lander_ecosanctuary_ea@blm.gov>

"YES" to Double D Ranch Proposal

1 message

jacquelinerick@aol.com <jacquelinerick@aol.com> Tue, Mar 4, 2014 at 2:41 PM
To: BLM_WY_Lander_Ecosanctuary_EA@blm.gov

To BLM,
YES, please approve the Double D Ranch proposal.

Many thanks,
Jacqueline and Richard Ryan

Lander Ecosanctuary EA, BLM_WY <blm_wy_lander_ecosanctuary_ea@blm.gov>

Ecosanctuary

Elaine Taylor <laneytay@msn.com> Fri, Feb 7, 2014 at 1:45 PM
To: "BLM_WY_Lander_Ecosanctuary_EA@blm.gov" <BLM_WY_Lander_Ecosanctuary_EA@blm.gov>

I believe that this would be a good alternative to keeping the wild horses in holding pens, or allowing them to be sold to questionable people. My vote is to allow the EcoSanctuary to take as many as possible...
So, YES, I would like the EcoSanctuary north of Lander to be APPROVED. Thank you!!

Elaine Taylor
Cheyenne, WY
307-256-9381

Sent from Windows Mail

United States Department of the Interior

FISH AND WILDLIFE SERVICE
170 N. First Street
Lander, Wyoming 82520
(307) 332-2159

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LANDER FIELD OFFICE

March 3, 2014

Scott Fluer, Wild Horse Specialist
BLM Lander Field Office
1335 Main St.
Lander, WY 82520

Dear Scott:

Thank you for the opportunity to provide input into the proposed "Double D Wild Horse Ecosanctuary" located near the junction of highways 287 and 132 (Blue sky Highway). The ecosanctuary will encompass 900 acres and proposes to support a maximum of 250 feral horses.

As you know, our office's primary function is to assist the Eastern Shoshone and Northern Arapaho tribes with conserving fish wildlife on the Wind River Reservation (Wind River). The proposed ecosanctuary is within the reservation boundary, contains 600 acres of allotted tribal lands, and is surrounded by other allotted and tribal trust lands. We **strongly discourage** the BLM from issuing the approval for this project.

Our main concerns are as follows. Currently there are several thousand feral horses residing on trust lands of the reservation, and are causing excessive damage to ranges that native elk, deer and pronghorn occupy. These horses are a very serious problem without which, at present, there is funding to do any removal. The seriousness continues to increase as numbers of feral horses continue to multiply. Though an ecosanctuary will help reduce feral horse numbers on other federal lands, it will do nothing to address the issue at Wind River and will only worsen the situation. The ecosanctuary will be an unwanted "seed" source when escapees spread into areas of the Reservation where currently no feral horses reside.

Secondly, the number of horses appears to be high for the acreage. Mill Creek flows through the property and is currently severely overgrazed immediately upstream from the Double D. This number of horses will create additional overgrazing along Mill Creek residing on the Double D, decreasing fish and wildlife habitat and negatively affecting water quality. Finally, allowing this ecosanctuary will only set the precedent for addition ones to occur in this area, further spreading feral horses though escapement.

Thank you for your consideration,

Sincerely,

Pat Hnilicka

Pat Hnilicka
Acting Project Leader

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Lander Ecosanctuary EA, BLM_WY <blm_wy_lander_ecosanctuary_ea@blm.gov>

VRLP Scoping Comments on the Double D Wild Horse Ecosanctuary

1 message

Clerk <clerk@cebrooks.com> Tue, Mar 4, 2014 at 3:29 PM
To: "BLM_WY_Lander_Ecosanctuary_EA@blm.gov" <BLM_WY_Lander_Ecosanctuary_EA@blm.gov>

Dear Mr. Fluer,

Attached please find comments for scoping on the Double D Ranch Wild Horse Ecosanctuary submitted on behalf of the Vermillion Ranch Limited Partnership.

Please let me know if you have any problems with the attached document.

Thank you,

Amelia Pergl

Legal Assistant

C.E. Brooks & Associates, P.C.

303 E. 17th Avenue, Suite 650

Denver, CO 80203

t 303-297-9100

f 303-297-9101

VRLP Double D Ranch Wild Horse Ecosanctuary Comments FINAL.pdf
34K

Vermillion Ranch Limited Partnership
609 5th Ave West
Rock Springs, WY 82901

VIA EMAIL; NO ORIGINAL MAILED
Scott Fluer, Wild Horse Specialist
BLM Lander Field Office
1335 Main Street
Lander, WY 82520

Re: Comments on the Proposed Double D Ranch Wild Horse Ecosanctuary

Dear Mr. Fluer:

The Vermillion Ranch Limited Project (VRLP) submits these comments on the Notice of Scoping.

I. Policy Considerations

VRLP generally supports providing alternatives to the declining adoption for wild horses. Wyoming like most BLM offices has more horses in corrals than will be adopted. It continues to maintain excess numbers in herd management areas (HMAs) and lands outside of HMAs. In the past, wild horse sanctuaries worked in part because the manager was free to deal with the horses once on the sanctuary. BLM needs to clarify how this will work as well.

On the other hand, VRLP objects to the idea that sanctuaries are a remedy for excess numbers of wild horses on public lands, especially in Wyoming. To the extent that BLM is committing to funding these sanctuaries, it is moving appropriated funds from mandatory activities to discretionary. This is improper and does a significant disservice to the public land users.

II. Insufficient Information

The notice is so brief that it does not provide adequate detail about the proposed action. The following are just a few issues that have been omitted.

A. Rates of reproduction

The notice fails to explain how the ranch will keep the number of wild horses to 250. The Wyoming Bureau of Land Management (BLM) assumes an 18% to 23% increase each year. Will Double D Ranch plan to sell off horses as it takes in new ones, or will it simply stock up to 250 head and sell older wild horses as the numbers increase. If

Double D cannot sell or otherwise transfer wild horses, what is the outside capacity of the 900 acres?

If Double D plans to use PZP, the wild horse numbers will still increase, since the PZP is less than 40% effective unless Double D commits to annual booster shots.

B. Sustainability

We have understood the BLM national strategy to move away from gathers due to the costs to keep wild horses in corrals. It would appear that the sanctuary option does not reduce the cost but puts it into another account called sanctuary.

VRLP is not opposed to wild horse sanctuaries on private lands but questions how this is consistent with BLM's other policies, specifically addressing the continued costs of supporting wild horses.

C. How will trespass be handled?

Will the wild horses retain their status as a wild horse with full protection under the Wild and Free-Roaming Horses and Burros Act?

If the wild horses do not pass into private ownership, then if wild horses escape to private or public land, no one but BLM can gather them. This can create a significant management issue for the adjacent private, federal, and state lands. How will Double D or BLM deal with it?

If they are no longer classified as wild horses, then will federal support terminate?

VRLP recommends that BLM provide comment on a draft environmental assessment to address these issues. The concept is a welcome one but the above issues need to be explored and analyzed.

Sincerely,

/s/ Jean Dickinson
Vermillion Ranch Limited Partnership

Lander Ecosanctuary EA, BLM_WY <blm_wy_lander_ecosanctuary_ea@blm.gov>

Ecosanctuary

1 message

Renee Vincent <uggy2002@aol.com> Thu, Feb 6, 2014 at 3:18 PM
To: "BLM_WY_Lander_Ecosanctuary_EA@blm.gov" <BLM_WY_Lander_Ecosanctuary_EA@blm.gov>

The horses need to stay on their land that was designated for them. No one is believing the lies that are coming out if our office !! Your running the grazing permits in the red again this year and spending 12 on rounding up our wild horses? That math does not add up!! This will not go away! I personally have pledged to help stop your cruel treatment of our American icons. God doesn't sleep and I have no idea how any of you sleep at night!!! Your moral compasses are certainly not on true north .... And the public knows it!

Sent from my iPhone

WYOMING GAME AND FISH DEPARTMENT

5400 Bishop Blvd. Cheyenne, WY 82006

Phone: (307) 777-4600 Fax: (307) 777-4699

wgfd.wyo.gov

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February 12, 2014

WER 13305
Bureau of Land Management
Lander Field Office
Scoping Notice
Proposed Double D Ranch Wild Horse Ecosanctuary
Environmental Assessment

Scott Fluer, Wild Horse Specialist
Bureau of Land Management
Lander Field Office
1335 Main Street
Lander, WY 82520

Dear Mr. Fluer:

The staff of the Wyoming Game and Fish Department has reviewed the Scoping Notice for the proposed Double D Ranch Wild Horse Ecosanctuary Environmental Assessment. We offer the following comments for your consideration.

The Wyoming Game and Fish Department, Lander Region, has no comments on this proposal.

Thank you for the opportunity to comment. If you have any questions or concerns, please contact Greg Anderson, North Lander Wildlife Biologist, at 307-332-7723 ext.236.

Sincerely,

Scott Lemor
for Mark Konishi
Deputy Director

MK/mf/gb

cc: USFWS
Greg Anderson, WGFD – Lander Region

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FEB 19 2014
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Lander Ecosanctuary EA, BLM_WY <blm_wy_lander_ecosanctuary_ea@blm.gov>

Wind River Visitors Council Support Letter for Wild Horse & Burro Sanctuary

McCormick Marketing, Inc. <info@mccormickmarketing.com> Tue, Mar 4, 2014 at 3:25 PM
To: BLM_WY_Lander_Ecosanctuary_EA@blm.gov
Cc: oldham@wyoming.com, Scott Fluer <sfluer@blm.gov>

To Whom it May Concern:

RE: Eco-sanctuary: Wild Horse & Burrow Sanctuary, Fremont County, Wyoming

Attached please find the Wind River Visitors Council's letter of full support for this amazing opportunity. We have provided it as both a pdf and jpeg file for your convenience. Please do not hesitate to call upon us for any clarity or further information to move this endeavor forward.

Sincerely,

end
-
Paula McCormick, Marketing Director
Wind River Visitors Council
McCormick Marketing, Inc.
263 N. 8th St.
Lander, WY 82520 USA
Ph: 307-332-5546
Fax: 307-332-5336
email: info@mccormickmarketing.com

Your Fremont County Lodging Tax Dollars at Work!

Wind River Visitors Council
email: info@windriver.org
Web: http://www.windriver.org
Web: http://drivethetop10.com

Facebook - Fan us!
Twitter - Follow us!
You Tube - Watch us!
Flickr - See us!

Visit our interactive I-Brochure on-line!

4 attachments

p signature.jpg
6K

Wild Horse Sanctuary WRVC support.jpeg
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WRVCIbrochureSig..jpg
42K

Wild Horse Sanctuary WRVC support.pdf
267K

WYOMING'S WIND RIVER COUNTRY
The Only Way to Yellowstone.
WIND RIVER VISITORS COUNCIL
P.O. Box 925 Lander, WY 82520 USA • 307-332-5546 • info@windriver.org • www.windriver.org

March 4, 2014

United States Department of the Interior
Bureau of Land Management – Lander Field Office
Wild Horse and Burro Resource Management

To Whom it May Concern:

This letter is to express the full support by Wyoming's Wind River Visitors Council of former Wyoming State Veterinarian Dr. Dwayne Oldham's efforts to spearhead a Wild Horse and Burro Sanctuary on the Wind River Indian Reservation. We have every confidence in his thorough knowledge of range management and established history proves that he is more than qualified for such a multi-beneficial endeavor.

The location of the 900-acre Double D Ranch in Fremont County, Wyoming is easily accessible to U.S. Highway 287. This location would provide huge visibility and easy access for Wyoming residents and the constant stream of tourism traffic driving to and from Yellowstone and Grand Teton National Parks. This highway is the only direct access to the southeast entrance to Yellowstone National Park, which has over 3 million visitors annually.

The two Native American tribal populations, the Eastern Shoshone and Northern Arapaho tribes, have had cultural ties to horses for centuries. This proposed location on the Wind River Indian Reservation would allow many Native American residents a chance to understand this historical connection to their cultural roots while broadening and strengthening surrounding community bonds.

Visitors from all over the world would be provided a once-in-a-lifetime educational and cultural experience to understand the history of wild horses and burros, and their opportunities to fit into today's society. With the professional equine training resources that Dr. Oldham has identified, these relocated animals can have a second chance as riding horses, packhorses, therapy horses, and family pets.

The convenient proximity of the proposed Double D Ranch location is close to the towns of Fort Washakie, Lander, and Riverton, as well as being right on the way to Yellowstone National Park. This site could not be more perfect. There are several colleges and strong educational bases for community involvement, on and off the Wind River Indian Reservation: the National Outdoor Leadership School (America's premiere outdoor educator), the Wyoming Catholic College, Central Wyoming College and its extension branches, and the Wind River Tribal College.

The Wind River Visitors Council, Fremont County's lodging tax entity, is responsible for promoting tourism for Fremont County. The Council welcomes the opportunity to work with Dr. Oldham to create appropriate and successful cultural tourism programs. Our tourism programs and promotions would enhance full awareness on all levels of the Wild Horse and Burro Sanctuary as part of our visitors' real western experience while in Wyoming. The trending statistics prove there is a willing market for this unique eco-tourism attraction, which would be unlike any other experience available in the US.

To summarize, the Wind River Visitors Council whole-heartedly supports Dr. Oldham's significantly important and humane project, which provides a win-win situation for all concerned, now and in the decades to come.

Most sincerely,

Paula McCormick

Paula McCormick
Marketing Agent for the Wind River Visitors Council
cc: Dr. Dwayne Oldham
Scott Fluer, Wild Horse Specialist, BLM Lander Field Office

Scott Fluer, Wild Horse Specialist
BLM Lander Field Office
1335 Main Street
Lander, WY 82520

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RE: Proposed Double D Ranch Wild Horse Eco-sanctuary

As a Land owner adjacent to the Proposed Double D Wild Horse Eco-sanctuary, I would like to share my comments for your consideration in the development of your EA and to express my strong opposition to the proposal. My family has ranched in this same location for over 40 years raising cattle and registered Quarter Horses.

We share one and three quarter miles of boundary fence with the Double D. The majority of common boundary with the Double D is 50+ years old and would require replacement before BLM even considers placing 250 head of excess BLM horses on the Double D. The current fence was designed for cattle and horse use and would need to be replaced with a fence that takes both cattle and horse use into account. The current fencing is a combination of woven wire and barbed wire. The majority of the cattle use is cow/calf and the 4 wire barbed wire fence identified in the Request for Application would be inadequate for control of the cattle.

Barbed wire can be an effective barrier for horses provided the horse use is confined to one side of the fence at a time and the stocking rate isn't to high. When horses are pastured on both sides of the fence at the same time, especially if there are large numbers of horses or a mixture of age classes and sexes are present has the potential for conflicts

between the horses across the wire and can result in horses being caught in and cut by the wire. Historically in the area immediately adjacent to the Double D there were 4 privately owned studs running with mares and foals on private and leased lands. To place BLM mares and/or recently castrated range studs across a barbed wire fence from these private horses would be totally irresponsible on the part of the BLM.

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As I stated earlier, for much of the 40+ years that we have ranched here we raised registered quarter horses. During the past 5 years we have had to cut back on our horse numbers due in part to the increase in the numbers of private horses on adjacent properties. We have done this primarily to minimize horse to horse encounters across wire fences and the potential damage that can result to the horses. We have limited our horse use to the extent possible to areas that are separated from other horse use. If BLM places 100 to 250 horses on Double D properties adjacent to our private lands it will make our properties unusable for raising horses in the future. As I am sure you are probably aware if you watch the realty market, horse properties generally command a significantly higher price than cattle properties. I believe that by approving the Double D proposal the BLM will effectively devalue my property that is adjacent to it.

My children grew up and learned to ride horses here working our cattle. If the BLM places a large number of horses across the fence from us my young grandchildren will lose out on those opportunities because it would be unsafe and irresponsible to allow them to ride in our pastures where the potential exists for a large number of horses to run up to our fence line spooking the horses my grandchildren would be riding.

The Request For Applications (RFA) states in part that a successful applicant's proposal will be able to: Ensure that the proposed sanctuary is located a minimum of 10 miles away from existing herd management areas (HMAs) or Herd Areas (HA). Why does the BLM feel it is so important to maintain a 10 mile buffer between a sanctuary and a Herd Area when they are totally silent to the need for any buffer between the sanctuary and privately owned horses. There seems to be a gross inconsistency in this guidance between how horses on BLM lands are treated versus privately owned horses.

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I believe the Double D properties to be unsuitable for an eco-sanctuary.
In reviewing the Request For Applications and BLM Manual 4710, four common elements are identified for horse habitat: feed or forage, water, cover or shelter, and space or allowed to roam freely.

The Double D properties have one year around water source (mill creek) which is only accessible from a few of the pastures. The remainder of the property is watered seasonally (6 months) during irrigation season and a drainage ditch that supplies water to one or two pastures for 8 to 10 months each year. One additional pasture may have a water well. I don't believe the existing water to be adequate since several of the pastures are only watered during the irrigation season.

There is essentially no cover or shelter on the Double D properties. The majority of the pastures don't have any shelter to protect the horses from winter storms. Since the area is essentially flat there are no ridges or high points where the horses can find a breeze to help them contend with the abundance of Deer flies and mosquitoes typically found in the

area during the summer months.

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The Double D properties are broken up into 40 to 80 acre pastures which to me is inadequate to meet the space standard or the intent of roam freely.

An additional consideration is that a significant portion of the properties are very boggy and swampy and essentially unusable for horses during the summer months. In addition to this being a safety concern it contributes to problems with the horses hooves and will result in a higher maintenance cost. The horses hooves will have to be trimmed more often than they would if running on sandy or rocky ground. These boggy or wet areas also contribute to problems maintaining the fences in serviceable condition. Some of these areas involve perimeter fences that are critical to minimize horse trespass on adjoining private lands.

A significant investment on the part of the BLM would be necessary to bring the involved properties and facilities to a standard the would be suitable for the horse use proposed by the Double D. Since the Double D proposal includes tribal and allotted leases that have to be renewed every 5 years without any assurance of renewal, this investment could result in a very limited return if the leases are not renewed. I don't feel this would be wise use of our tax dollars.

Going beyond the proposal that is currently under consideration, I feel the BLMs Wild Horse program is broken. Sanctuaries and other forms of long term storage of excess

horses does nothing towards fixing the problem of overpopulation on the BLM lands. Until you get herd reproduction under control and down to levels that will maintain your targeted horse numbers, you are just going to keep creating a bigger problem for long term storage of these excess animals that will continue to drain your funding and prevent you from undertaking more intense management of the horses in your HA's and HMA's. Additionally the BLM needs to move forward with disposal of the unwanted excess horses. I realize that disposal of excess horses is not a favored action but it may be the only feasible one.

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I would like to thank you for your consideration of my comments and concerns. I would also request that if you feel any of my comments that you feel are beyond the scope of this EA that you forward them to the appropriate authorities in your organization that would have that jurisdiction.

Lander Ecosanctuary EA, BLM_WY <blm_wy_lander_ecosanctuary_ea@blm.gov>

Lander Wild Horse Sanctuary

1 message

V L WRIGHT <jenrickwright@msn.com> Tue, Feb 18, 2014 at 10:31 AM
To: "BLM_WY_Lander_Ecosanctuary_EA@blm.gov" <blm_wy_lander_ecosanctuary_ea@blm.gov>

This email is to support a wild horse sanctuary at the Double D Ranch. The wild horses in Wyoming have been given a bad deal and to give them another opportunity to survive is necessary.
Not only would this be good for the wild horses but Wyoming, tourism, and the west.
I would be interested too in assisting in any other way possible to help this succeed.
Mrs. Richard Wright