

**Phoonswadi-Brewer, Sean**

---

**From:** Lander RMP  
**Subject:** Comments on Lander RMP Revision & EIS

---

**From:** Mary Dustin [mailto:marydustin99@yahoo.com]  
**Sent:** Tuesday, January 10, 2012 12:26 PM  
**To:** BLM\_WY\_LRMP\_WYMail  
**Subject:** Comments on Lander RMP Revision & EIS

Please accept and give serious consideration to the following comments on the draft Lander Field Office Resource Management Plan (RMP) and Environmental Impact Statement (EIS).

The current draft RMP and EIS are insufficient because no meaningful alternatives are provided and the token alternatives proposed do not adequately protect and preserve wild horses as required by federal law.

The EIS is inadequate for the following reasons:

- Lacks monitoring data upon which decisions for resource allocation decisions should be made. Indeed, Rangeland Health Assessments have been performed for fewer than half of the livestock grazing allotments within the planning area. Of those that were assessed, approximately half failed to meet standards, with livestock grazing listed as a causal factor.
- Fails to provide any data whatsoever on Herd Areas (HAs) that have been “zeroed out” for wild horses and fails to consider an alternative for reinstating HAs as Herd Management Areas (HMAs).
- Lacks data on genetic assessments of wild horses in the HMAs upon which decisions about proper “Appropriate Management Levels (AMLs) and genetic health should be based.
- Lacks description and analysis of the impacts of “chemical and other population control measures” to be implemented. This vague language is unacceptable. At minimum the EIS must analyze the impacts of each of the possible options (i.e. permanent sterilization, castration of stallions, spaying of mares, various chemical fertility-control methods, etc.).
- Fails to take the required “hard look” at alternatives for wild horse management. In fact, the only meaningful difference between the proposed alternatives considered is the establishment of a wild horse viewing loop and limited removal of fencing.

With regard to the draft RMP itself, I support Alternative B in the final RMP, only because it offers the most protections to wild horses and the environment by placing greater limitations on energy development, mining and livestock grazing. However, I endorse the American Wild Horse Preservation Campaign’s recommendation that the following provisions be included in Alternative B.

Record # 4110 (Table 2.2, Volume 1) -- Appropriate Management Levels (AMLs) for Wild Horses – The AMLs of five of the seven HMAs are arbitrarily low and genetically unsustainable. Please incorporate the following management actions into the final RMP:

- Increase AMLs in all HMAs and reduce livestock grazing, pursuant to 43 C.F.R. 4710.5(a). The current imbalance in which authorized livestock use in the planning area outnumbers wild horse use by at least 23-1 must be reversed.
- Increase AMLs in all HMAs to a minimum of 150 animals, which is the minimum number necessary to sustain genetic viability, according to leading equine geneticists. BLM claims of horse movement across HMAs are unsubstantiated and do not negate the need for each HMA herd to have a genetically-viable population number.
- Evaluate the current usage of all “zeroed out” Herd Areas, and if livestock grazing currently take place, utilize 43 C.F.R. 4710.5(a) to reduce or eliminate livestock grazing in order to improve conditions and forage availability for wild horses. The relocation of healthy self-sustaining herds to these HAs or the introduction of horses from holding facilities must be included in the RMP.
- Designate all HMAs and HAs in the planning area as wild horse ranges to be managed principally for wild horse herds pursuant to 43 C.F.R. 4710.3-2.

Record # 4111 -- Population Control Measures to Be Used on Wild Horses

- Eliminate removals as a population-management strategy in all but emergency situations. Properly utilize non-

hormonal PZP fertility control to accomplish this goal.

- Prohibit all detrimental types of fertility control, including hormonal fertility control methods, castration, spaying, permanent chemical sterilization, and sex ratio skewing, all of which alter wild horse behavior.
- Establish a policy to promote the protection of predator species in an effort to restore natural population control mechanisms and restore the thriving natural ecological balance of these public lands areas.

Record # 4112 -- Dealing with Horses Outside HMAs

- Establish a policy to return horses found outside HMAs to the HMAs. Implement range improvements to eliminate reasons for horses to leave the HMA, i.e. address water shortages by installing guzzlers.

Record # 4113 -- Selective Removal Criteria for Wild Horses

- Restrict removals to emergency situations. Conduct any roundups or catch-treat-release operations in a manner that preserves family band structures, so as to maintain the stability and integrity of wild horse social organization and establish humane policies to prohibit roundups in below freezing weather or in weather hotter than 85 degrees F.

Record # 4117 -- Year-Round Water Sources

- Install a system of strategically-placed large, in-ground guzzlers to help maintain and conserve adequate water sources year-round. Require livestock permit-holders to keep their water improvements operating and available for wildlife, including wild horses, even when the grazing seasons conclude.
- Establish a systematic process for allocating water and accounting across all multiple uses.
- Restore, in an environmentally-sound manner, water sources to better manage wild horses within HMAs.
- Although stated as an objective for management action, the draft RMP does not detail how the BLM would ensure a continuous supply of water for the wild horses under its jurisdiction.

Record # 4121 -- Fences

- Remove fencing to the extent possible, and minimize construction of new fencing, to create corridors for natural migration by wild horses and other wildlife species. This will minimize any impacts on the range.

Thank you for your consideration.

Mary Dustin  
1263 Lost Nation Road #14  
Willoughby, Ohio 44094