

**Phoonswadi-Brewer, Sean**

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

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**From:** Judith Fader [mailto:judithfader@verizon.net]  
**Sent:** Monday, January 16, 2012 10:52 AM  
**To:** BLM\_WY\_LRMP\_WYMail  
**Subject:** Lander RMP--Comments on Lander RMP Revision & EIS

**Comments on Lander RMP Revision & EIS**

I have reviewed the original 1987 RMP as well as the currently proposed revised RMP in preparing my comments on the revised RMP and I would like to begin with the following observations.

"The (1987) decision on the Lander RMP was based on consideration of four planning issues (Grazing Management, Oil and Gas Leasing and Development, Landownership Adjustment, and Forest Management), the environmental impacts of the alternatives, public comments, and consultation with government agencies at the federal, state, and local levels."

As Appendix A (page 80) of the 1987 decision makes clear, "wild horse herd management plans" have always been designed to effectively minimize wild horse population (maintaining it at or below "the 1979 population level as a maximum") and further reduce wild horse numbers, "As funding becomes available, wild horse numbers will be reduced" and completely removing horses from some allotments, "All horses will be removed from the East Beaver Allotment number 1801."

The fact that the tables in Appendix A state that the "(Season-of-use shown are for cattle, unless otherwise noted)" strongly indicates the preference given to cattle grazing in the 1987 RMP.

In reviewing the revised RMP under consideration, it strikes me that wild horses are still almost an after thought and only get an "honorable mention."

In the current Lander Draft RMP and EIS posted for public comment, the "New Data" (page 3, Chapter 1, section 1.2.1) being considered for revising the existing RMP does not include any current scientific data about the minimum number of horses in a herd needed to maintain the genetic viability of wild horse populations or the fact that horses evolved in North America and should now be considered a native wildlife species. In fact, the high AML numbers given in table 2.22 (page 110), are too low to support long-term genetic viability in all but two of the seven herd areas.

In Section 1.4.1, Issues Addressed, wild horses are not even listed as an issue being addressed in the revised RMP, although "Livestock Grazing and Vegetation Management" gets equal billing.

Wild horses are mentioned in Section 1.5, Planning Criteria, but only in reference to management "consistent with the Wild Free-roaming Horses and Burros Act of 1971," which the BLM historically seems to have ignored, except for provisions that make it easier to justify measures to reduce wild horse and burro populations everywhere in order to increase forage for cattle and sheep grazing.

I understand that "Livestock grazing is a FLPMA authorized use of BLM-administered lands" and "Not authorizing a use allowed by FLPMA in the absence of supporting data...would not meet the principle of multiple use and sustained yield" (page 24, section 2.4.9). However, I have been following the

BLM's management of wild horses for some time now and I also have noticed that in general the BLM seems to avoid doing rangeland studies so as (in my opinion) not to have data on specific areas under consideration and that the BLM ignores existing rangeland studies that (always) indicate that livestock grazing significantly degrades the health of rangeland as well as watershed and riparian areas.

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).

I believe that 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 because it:

- 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.

In regard to the draft RMP itself, I support the adoption of Alternative B in the final RMP, 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 strongly endorse the American Wild Horse Preservation Campaign's recommendation that the following provisions be added to 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. Specific measures for achieving this objective should be added.

#### 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 as well as improve the genetic viability of all the animals in these areas.

Thank you for your thoughtful consideration.

Sincerely,

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