Lander Draft RMP and EIS
Bureau of Land Management
Lander Field Office
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Attn: RMP Project Manager

Subject: Lander Draft Resource Management Plan Comments

To Whom It May Concern:

On behalf of The Cloud Foundation, a 501(c)3 non-profit corporation, our thousands of supporters throughout the United States; The Equine Welfare Alliance; Front Range Equine Rescue; the Colorado Wild Horse and Burro Coalition and the over 90 organizations represented thereby, thank you for the opportunity to submit the following input for your consideration.

In this document, you appear to favor Alternative D in your draft Resource Management Plan (RMP) and Environmental Impact Statement (EIS) which would not promote and protect wild horses in a manner consistent with the intent of the Wild Free Roaming Horses and Burros Act of 1971 (WHB Act), nor is in the best interests of the wild horses of the area or the many tourists and concerned parties who appreciate visiting them.

We encourage BLM to focus on protective measures, which preserve the genetic viability of the wild horses in the Lander planning area and enhance viewing opportunities for the public. The following are recommendations that should be incorporated into the RMP.

Raising Appropriate Management Levels (AML) and increasing forage allocation for wild horses

Currently, there are seven HMAs in the RMP area. Range expansion should be considered in this new RMP. In order to maintain the genetic health of each *individual* HMA, we recommend elimination of the Red Desert Complex concept. Each HMA should be managed as its own entity. The AML should be raised in the Antelope Hills/Cyclone Rim, Conant Creek, Crooks Mountain, Dishpan Butte, and Rock Creek HMAs to allow for at least 150 horses, but optimally 200 horses per HMA. Muskrat Basin and Green Mountain should also be considered for higher AMLs than their present ones.

BLM explains many of the horses within the Antelope Hills/Cyclone Rim HMA exhibit Spanish characteristics. However, BLM is only allowing for 60-82 horses in that population. The AML should be raised immediately in order to maintain the genetic health of the herd. BLM plans to conduct roundups in this area every few

years, but this will only speed up the genetic loss within the herd. As Dr. Gus Cothran, the nation's foremost equine geneticist, reminds us: once genetics are lost, they are lost forever. Severe genetic compromises in herd health can occur in just 1-2 generations, according to Cothran.

It is our recommendation that you reduce the number of permitted livestock within the HMAs and their surrounding areas to ensure the health of the wild horses, wildlife, and the rangeland itself. It is an injustice to the scientific community and the public to ignore the damage cattle and sheep do in comparison with wildlife (including wild horses). Over 97% of BLM-managed surface area (in this RMP area) has livestock grazing on it. Each alternative provided in this draft RMP does not see a reduction to less than 96%. It is our recommendation that livestock grazing be drastically reduced or eliminated from wild horse HMAs and any further expansion of HMAs.

BLM assigns 1.15 Animal Unit Months (AUMs) per horse in this area, which would mean that each horse is in excess of 1,200 pounds! According to the BLM's website *adult* wild horses in the Lander area weigh between 750-1000 pounds, which is the standard weight for one AUM. In contrast, the average weight of a cow is in excess of 1,000 pounds, and even up to 1,500 pounds[1]! **It is our recommendation that each wild horse is assigned 1 AUM and cattle be assigned at least 1.15. It is unscientific and unethical to punish the wild horse population while propping up a taxpayer funded, subsidized grazing program.**

In order to help expand rangelands past manmade boundaries, we recommend BLM consider the construction of wildlife underpasses, which would help stimulate genetic exchange.

Remove fencing to allow more natural, free-roaming behavior

The vast majority of the HMAs in this area are managed for livestock with a maze of interior fencing. **We recommend that BLM remove all interior fencing that prohibits wild horse free-roaming behavior.** Only draft RMP alternative B supports this.

Fencing does not benefit any wildlife species, especially wild horses.

Prohibit certain invasive management strategies in new RMP

Artificial sex ratio adjustments can result in social disruption, which can lead to compensatory reproduction[2]. In the wild, nature balances sex ratios at a 50/50 sex

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[1] "Updating the Animal Unit Month. Carter, John G. 2007. Western Watersheds Project. http://projects.ecr.gov/tushar/pdf/Carter_AUM_paper.pdf

[2] *Compensatory Reproduction:* "As the density of horses is reduced, the remaining animals breed at younger ages, have less time between foals and in general speed up reproduction through a process

ratio averaged over time. There is a natural reason for this. Wild horses live in family bands with, normally, one band stallion that defends his group of mares from other males. By increasing the number of males and decreasing the females, the fabric of wild horses society will be torn apart. There will be increased competition among the stallions to win and keep a mare; the health of the stallions and mares can decline due to excessive fighting and running; more injuries can occur, not only to stallions, but also to the mares and particularly to foals caught up in the melee.

We recommend that BLM allow for a natural 50/50 sex ratio and that this be incorporated as policy in the new RMP.

We recommend that BLM eliminate from consideration the use of PZP-22 in the Planning Area.

If PZP is to be used, we recommend the use of the **one-year** PZP drug that has been tested, is field-dartable and reversible, can be given at the appropriate time of the year to a select number of mares, and is applied only in herds that are large enough to remain genetically viable. Any PZP use must be accompanied by *thorough* tracking of mares on the drugs to determine the effectiveness of the drug and any negative side effects.

In addition, any surgical methods of fertility control should be explicitly prohibited by the new RMP. This would include methods such as gelding, spaying or any permanent chemical sterilization. These methods alter wild horse behavior and would be detrimental to the preservation of these wild horse herds.

Provide further protection for predators

Reducing hunting tags to allow for the population of mountain lions to increase would be a natural solution to stabilizing wild horse populations. Predation is a major way nature controls populations of wild prey animals. Mountain lions are a natural predator of wild horses, usually foals. It is far more economical to allow populations to be controlled through natural means as opposed to unnatural, cruel, and costly roundups. Nor is it contrary to the WH&B Act, as so many BLM field offices have cited in their NEPA documents. On the contrary, this 'minimum feasible' management style is precisely what the WH&B Act intended.

Eliminating natural wild horse predators for the benefit of livestock grazing is not acceptable. It also does not allow for a thriving natural ecological balance, which BLM continually preaches is their goal and a reason for conducting wild horse removals. If the predator population is allowed to thrive, it helps the natural balance

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known as compensatory reproduction." Dr. Jay Kirkpatrick, PhD quoted from his article: Managing Wild Horses Through Fertility Control (http://www.wildhorsepreservation.com/resources/fertility.html)

of the ecosystem and ultimately helps preserve the wild horses in a natural balance with their environment.

In a recent predation study[3] conducted by Canadian biologists, they found that mountain lions eat much more than previously thought. Indeed, "Cougars tended to kill younger animals, especially when preying on feral horses and moose (the largest prey available in west central Alberta)." They also observed a cougar that "brought down a feral horse in less than 30 yards from where it attacked." Predation of wild horses, according to this study, increases sharply during the summer months when more young horses are around.

We recommend that BLM work with the Wyoming Game and Fish to curtail mountain lion hunting and allow for natural management in wild horse herd areas.

Support wild horses as an attractive part of the landscape

BLM policy has consistently viewed the presence of wild horses on public lands as a problem instead of an opportunity. In the "Planning Issues Addressed" (Section 1.4.1), wild horses are not even listed as an issue. Why is this? They should be treated as a natural and cultural part of the landscape, certainly they are considered as such in the WH&B Act.

While we do appreciate the addition of a 'wild horse scenic loop' as suggested in the RMP, BLM needs to be really committed to the idea of a genetically viable wild horse populations on their designated ranges. The presence of wild horses has the potential to be an economic draw for the area, if BLM truly treats it as such. Appropriate and visible signage about the history of the herds would help visitors understand our native equid better. According to Ross MacPhee, PhD, Curator of the Division of Vetebrate Zoology at the American Museum of Natural History, "It needs to be more widely understood that the horse's status as a native North American species is beyond serious question… There are no paleontological or genetic grounds for concluding that it is native to any other continent." And they would gain vital knowledge about how to behave when viewing wild horses. Acting non-threateningly and maintaining a respectful distance will help visitors experience the true, natural, complex behaviors of wild horses.

Certainly in the Pryor Mountain Wild Horse Range, the mustangs largely ignore human presence; yet go on high alert when predators in the form of bears and cougars are around. I have seen this first hand.

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[3] Study conducted by biologists at the University of Alberta: "Cougar Kill Rate and Prey Composition in a Multiprey System" can be found in *Journal of Wildlife Management* 74(7):1435–1447; 2010; DOI: 10.2193/2009-314

We recommend that you consider wild horses as a natural component of public lands and an economic opportunity, not as a problem. We recommend that you encourage the protection of wild horses so that an admiring public might view them.

Range Improvements

It is our recommendation that BLM consider the construction of guzzlers for wild horses and other wildlife. Any concerns associated with riparian areas would be alleviated and it would help spread wild horse use. BLM needs to appreciate that wild horses will not alter their habits overnight but will grow to rely on the guzzlers over time. If BLM can adopt a more flexible and appreciative attitude, wild horses will have a greater opportunity to thrive.

Reseeding rangeland is a much less costly option than a helicopter removal. It is our recommendation that BLM help the range by treating any noxious species and reseed with appropriate, native grasses and shrubs.

Conclusion

I urge you to consider our recommendations when finishing the new Resource Management Plan. As a returned native species, the mustang plays an important role in its native environments. The American public would like to see them roaming freely in their wide western homes and would *pay* to view them in their natural family bands.

Thanks for this opportunity to submit our comments for this draft RMP. Please put us on a list to receive all materials related to the management of wild horses generated by the Lander Field Office.

Sincerely,

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