

January 17, 2012

Lander Field Office
 Atten: RMP Project Manager
 1335 Main Street
 Lander WY, 82520



Re: Resource Management Plan/Environmental Impact Statement

To Whom It May Concern:

I would like to comment on the plan at hand for the seven HMAs that will be impacted by this plan. First I would like to go on record as stating that the BLM and government notices that ask the public to comment should be longer than a 30 day period, 40 to 50 days would at least give us the time to respond and gather the required information.

Secondly, in June of 2010, Mr. Bob Abbey stated, "The new long-term strategy will take the BLM's Wild Horse and Burro Program in an unprecedented, new direction. And as part of that effort, we want all those with an interest in the wild horses and burros and their PUBLIC LANDS to consider our initial ideas and offer their own." On July 30, 2010 a letter signed by 54 members of congress sent a letter to Mr. Salazar stating in part, "We urge you to refrain from further actions (gathers) until a clear plan is in place to sustainably manage and protect our wild herds. Only then can we move forward with a more informed, open and deliberate process based on input from all who are concerned with the health, well being and conservation of these animals." To the best of my knowledge neither of these comments have had any bearing on the horses and certainly not your RMP/EIS plan that has been proposed. It lacks the adequate protection and preservation of the wild horses as provide in the Wild Free-Roaming Horse and Burro Act of 1971. This act was intended to allow the horses and burros to continue to exist in a natural state on lands where "presently" found and also to be managed in their HMAs primarily for the horses and burros-- not for livestock use.

Why must horses be zeroed out of HMAs in favor of livestock turned on to these ranges? Livestock outnumber horses on all HMAs. How much study has been done to determine the range effects of horses versus cattle and by whom? Were there independent studies or studies done by BLM officials with livestock personnel looking over their shoulders? The BLM officials seem to cater to the livestock industry when any type of research is being done. I suggest that the numbers coming from the BLM are incorrect. Many permittees over-graze their permit areas and of course the horses are to blame as there is no big "lobby" for these horses as there is for the livestock industry.

Following are some points that I would hope would be considered to keep healthy and viable herds in your RMP/EIS:

1. Gain a better knowledge of the horse population, grazing distribution and band distribution within each of the seven HMAs—Antelope Hills, Conant Creek, Crooks Mountain, Dishpan Butte, Green Mountain, Muskrat Basin and Rock Creek.
2. Recalculate the AML for each HMA, based on science and accurate base-line data for each herd. Hopefully with help from independent and outside personnel.
3. Adding reliable water projects using drip systems, guzzlers or other plans, should be considered a top priority for horses and other wild animals for better use and condition of the range land. When livestock are allowed in these areas, the permittees should help cover the costs of setting up and help maintain them. The public should not have to bear the cost for subsidizing the livestock industry.

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4. No gathers should be conducted in extreme weather conditions and certainly not during the foaling season from March through September for the safety of pregnant mares and new born foals.
5. The bait trapping method should be used with any type of gather and the use of the fertility control Porcine Zona Pellucida (PZP) should be used for a birth control method. This has been scientifically proven to not only be an effective and safe contraceptive, but a much more humane and thousands of dollars less expensive than the use of helicopters for gathers. Volunteers who have been certified in the course of field darting and administering the PZP could be used to also cut down the costs of this project. Bait trapping is an excellent way of administering the PZP while horses are in a confined area. While this system requires time and personnel, consider the cost factor that involves helicopters; these operators that work when the time is convenient for them not when the time is good for the horses. These helicopter contractors have made millions off of the BLM.
6. There should be no sex manipulation—having more stallion than mares—in the planning. I am strongly against spaying of mares or gelding of stallions that are to be returned to the HMA and no outside bloodlines—other mustangs from other HMAs—brought into the herd ranges. These procedures are very expensive when you consider what would be involved and seem to me to be counter productive.

I believe that the plans should be to let the horses exist in a natural wild and normal setting and with the least amount of outside interference.

Therefore I recommend Alternative B on the final RMP as it requires the most protection for the horses and places the most restrictions and limitations on energy development, mining and livestock grazing. Livestock should be closely monitored to achieve that so called “thriving natural ecological balance” that the BLM seems to be trying to achieve and yet consistently sets low horse populations numbers and with no changes in the grazing numbers for livestock.

Sincerely,

Bettye Dominick

Bettye Dominick
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Cody, WY 82414

CC: Rock Springs Field Office, Cheyenne BLM

