Phoonswadi-Brewer, Sean

From: Lander RMP
Subject: RMP Revision -- Comments

From: MARYBETH DEVLIN [mailto:marybethdevlin@bellsouth.net]
Sent: Friday, January 20, 2012 3:47 PM
To: BLM_WY_LRMP_WYMail
Subject: RMP Revision -- Comments

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

Lander Field Office RMP / EIS
Bureau of Land Management
Lander, WY

Attn: Kristin Yannone, RMP Project Manager

Subj: **Lander, Wyoming Resource Management Plan (RMP) Revision and DRAFT Environmental Impact Statement (EIS)**

Dear Ms. Yannone:

I have reviewed the Lander, Wyoming Resource Management Plan (RMP) Revision and DRAFT Environmental Impact Statement (EIS) -- including the three main volumes, the Analysis of the Management S of maps, and other associated documents. My focus, however, was the management of **wild horses** and any other mana affect them. I followed your recommended approach -- first I read the Executive Summary, then identified the topic mo horses). From there I focused on one [aspect related to that] topic at a time, familiarizing myself with the following sect following order:

1. Maps
2. Chapter 3 -- Current Conditions
3. Chapter 2 -- the Alternatives
4. Chapter 4 -- Impacts from other resources, effects analysis

In commenting, I have endeavored to observe the preferred format: Cross-referencing my response to each relevant "ma corresponding "record number" as listed in the various tables. In addition, I identified the Alternative that I recommend specific as possible, and to include suggested changes, sources, or methodologies so as to provide comments of substanc recommendations, however, I have discussed the relevant topics in depth. The cross-referenced comments are grouped following the discussions.

Finally, as it relates to my observations and comments, my background includes 30 years' experience in diverse capaciti retirement, I was employed as a Government Operations Consultant. Seven years of my career involved conducting mo funded programs to determine compliance with the law and regulations.

Lander's Herd Management Areas (HMAs)

Antelope Hills

Appropriate Management Level: 60 ↔ 82 wild horses
Size: 96,071 BLM acres
Acres per horse: 1,172 ↔ 1,601
Much of the HMA is also a designated uranium district, with large areas of projects.
The horses exhibit "traits of the Spanish mustang" that could be lost.

Conant Creek

Appropriate Management Level: 60 ↔ 100 wild horses.
Size: Acres not disclosed.
Size: Per other BLM source: BLM acres: 49,528 (57,702)
Acres per horse: 495 ↔ 826
See metapopulation section below for acres and acres per horse.

Crooks Mountain

Appropriate Management Level: 65 ↔ 85 wild horses
Size: 54,726 BLM acres.
Acres per horse: 644 ↔ 842 .

Dishpan Butte

Appropriate Management Level: 50 ↔ 100 wild horses
Size: Acres not disclosed.
Size: Per other BLM source: BLM acres: 92,282 (99,719)
Acres per horse: 923 ↔ 1,846
See metapopulation section below for acres and acres per horse.

Green Mountain

Appropriate Management Level: 170 ↔ 300 wild horses
Size: 99,231 BLM acres
Acres per horse: 331 ↔ 584

Muskrat Basin

Appropriate Management Level: 160 ↔ 250 wild horses.
Size: Acres not disclosed.
Size: Per other BLM source: BLM acres: 176,421 (193,325)
Acres per horse: 706 ↔ 1,103
See metapopulation section below for acres and acres per horse.

Rock Creek

Appropriate Management Level: 50 ↔ 86 wild horses
Size: Acres not disclosed.
Size: Per other BLM source: BLM acres: 19,107 (24,584)
Acres per horse: 222 ↔ 382
See metapopulation section below for acres and acres per horse.

Metapopulation -- Conant Creek, Dishpan Butte, Muskrat Basin, and Rock Creek.

Appropriate Management Level: 320 ↔ 536 wild horses
Size: 337,305 BLM acres
Acres per horse: 629 ↔ 1,054

Roll-Up -- HMA Data for Lander --

Approximate number of BLM-managed grazing acres in the planning area: 2,324,934

Number of BLM acres that are HMAs: 587,333.

Percentage of BLM-Lander-administered grazing acres that is HMA land: 25 percent.

Authorized wild horse population:

615 ↔ 1,003

Average acres per horse:

586 ↔ 955

The RMP proposes to maintain current appropriate management levels. There was no mention of former herd areas.

AUM Surcharge on Wild Horses

BLM-Lander tacks a **15-percent surcharge** on wild horse AUMs. Thus, every wild horse is deemed to use **1.15 AUMs** AUM, even though the draft RMP states on pdf-page 443 of Volume 1 that many of the subject wild horses "... range fro 1,000 pounds mature weight." Therefore, it is obviously inappropriate to assess more AUM-charges to petite horses suc surcharge functions as an **excuse for minimizing herd size while provoking livestock permit-holders**, who are led to using up more forage than they actually do.

Total True AUMs for Wild Horses:

7,380 ↔ 12,036

Total AUMs-with-Surcharge for Wild Horses:

8,487 ↔ 13,841

Please see discussion that follows on the proper calculation of AUMs.

Using the Animal Unit Month (AUM) Effectively

At the link below, please check out the chart showing animal weights and corresponding AUMs. Note that, for an AUM weight would be a creature **in excess of 1,200 pounds**. Note also the discussion of how selective breeding and cross-bre **cattle that are much heavier nowadays than they used to be**. Thus, if anything, BLM should be assessing livestock A

currently-prevailing average weight rather than continuing to use the old standard. It is unethical to penalize the diminu effect, subsidizing beefed-up cattle.

- http://www1.agric.gov.ab.ca/$department/deptdocs.nsf/all/agdex1201

Lander's Wild Horse Herd Levels Are Too Low to Support Genetic Vitality

According to the landmark **Summary Recommendations - BLM Wild Horse and Burro Population Viability Forun** facilitated by BLM Wild Horse Specialist **Linda Coates-Markle**, isolated wild horse herd populations of fewer than 20 vulnerable to loss of genetic diversity.

The low ends of the Lander HMAs' "appropriate management levels" fail to reach this minimal number and only two of that, per the Consent Decree, Lander reduces herds to the low ends of the established population levels when it conducts

Lander's solution to this deficiency is to administratively combine HMAs into a "metapopulation" -- that is, a populatior each HMA being assigned an herd size that would support genetic viability, the complex as a whole is considered the ge horses in each HMA can seem "appropriate," per assumed cross-migration and genetic exchange even though fences bar

There are actually two such complexes declared in the Lander planning area, although the RMP acknowledges only one composed of the following HMAs:

- Conant Creek
- Dishpan Butte
- Muskrat Basin
- Rock Creek.

The second metapopulation is not referenced in the RMP but was identified in an earlier Environmental Assessment co- Office, which shares jurisdiction with Lander over the five HMAs known as the **Red Desert Complex**. Here are the thr to Lander:

- Antelope
- Crooks Mountain
- Green Mountain.

BLM claims that the four HMAs it has combined, consolidated, and designated as the "North Lander Complex," and the been merged and labeled the "Red Desert Complex," constitute metapopulations that mix genetic information adequatel Summary of the Analysis of the Management Situation, pdf-page 222 -- that the HMAs in question were combined "... t diversity ...." But how? How does it follow that genetic mixing will occur among sparsely-populated herds isolated by fences? Being strictly hypothetical, BLM's metapopulation theory fails to pass muster, but serves as a ruse for justifying

BLM predicts even more diversity to manifest in these metapopulation contrivances via removal of a few fences. Again and unproven. The claims for fence removals -- which closer inspection show to be negligible -- also serve as additiona wild horse herds adequate population levels to ensure genetic viability.

Genetic Health of Lander's Wild Horses

Lander's draft RMP makes only passing reference to the genetic health of the herds, stating that it "... can be estimated d of body condition (e.g. the presence of physical abnormalities) at various times of the year." (Vol 1, pdf-page 440.) Be said inventories via aerial survey, it does not appear possible for Lander to gauge genetic status with this method. The a evaluation is by taking hair or blood samples from a representative portion of each herd and submitting those specimens genetics expert. Thus, the draft RMP is deficient in addressing management of its wild horse herds for genetic viability -

As was alluded to above, this past summer, the Lander and Rawlins Field Offices issued a joint environmental assessme conducted in the imaginary "Red Desert Complex," some of whose HMAs in this artificially-designated "metapopulatio Hills, Crooks Mountain, and Green Mountain -- as well as two administered exclusively by Rawlins -- Lost Creek and S that genetic samples had been taken during the 2009 roundup, and it provided what it represented as being a summary o Dr. Gus Cothran's report and recommendations. However, the supposed report was not included in the "References" sec the Lost Creek and Stewart Creek herds were tested in 2009. The methodology for taking the hair samples was not reve drawn during previous roundups had been collected "**from horses removed**" rather than horses released. Thus, there w Cothran had evaluated the Lost Creek and Stewart Creek herds as they had been or as they were left, following the roun seem invalid. The EA reported that the **Antelope Hills** herd was last tested in **2006**, with Dr. Cothran noting that the ap this herd was ***fairly low***, as it continues to be. Although the EA said that the Crooks Mountain and Green Mountain her **the summary provided did not appear consistent with a typical report from Dr. Cothran**. Indeed, it strangely refe **previous gathers**" rather than discussing the ones supposedly drawn in 2006. The EA indicated that samples "would be roundup. Not "will be" but "would be." Nor did it identify **which herds** "would be" tested and by **what methodology**. that there was "little evidence" regarding the Red Desert Complex herds' reduced genetic variation. True! BLM was wl all was well and not bothering to find out. It is obvious that reform is called for in this regard. Lander's draft RMP need herds' genetic health will be maintained, managed, and monitored. Such methods involve Best Management Practices, with regard to its wild horse herds.

Suggested New Approach for Establishing Correct Herd Sizes

The concept of "appropriate management level" -- formerly referred to as the "AML" -- has outlived its usefulness and r renamed. To begin with, BLM now uses the acronym "AML" to stand for "abandoned mine lands." That is how it is us and other plans reviewed recently. So, a replacement name and acronym are called for. That's a good thing because the anyway. The low levels to which herds are being held are "appropriate" only in the sense of being administratively con placed on herd size are unscientific. Even the upper bounds -- the high ends of the ranges -- are typically insufficient fo genetically self-sustaining.

To remedy both issues, it is proposed that herd sizes be determined per "**proper population parameters**" -- PPP or **P³** - RMP's glossary discloses that the P³ acronym is available. Each P³ would have **a baseline** -- a starting point -- of **at leas** number originate?

- According to Gus Cothran, PhD, the nation's foremost equine geneticist, "**A census population size of 150-200 minimum effective population size** (usually 1/4 to 1/3 of the of the total population)." Source: The Cloud Fou Although Dr. Cothran's statement suggests that 150 horses might be enough, the reform effort demands that an **o** minimal one be the goal. That way, herds will have a **margin of safety** in case a natural disaster were to strike.

- **A herd size of 200 is the level below which an isolated wild horse herd is particularly vulnerable to a decli** Source: Summary Recommendations of the Viability Forum facilitated by BLM Wild Horse and Burro Speciali Lander's wild horse herds must be deemed "isolated" due to the ongoing presence of literally hundreds of miles o in this review. Therefore, each HMA should have a herd size baseline of at least 200 individuals.

Those HMAs with low-end herd levels currently above 200 would maintain those values and could be considered for inc
would approximately equal **60 percent** of the high ends, giving BLM a 40-percent management range, just as it has now
approximately equal **80 percent** of the high ends.

The **P^3s** -- low, midpoint, and high -- for the Lander HMAs would be identical:

---

200 ↔ 267 ↔ 334 -- Antelope Hills
200 ↔ 267 ↔ 334 -- Conant Creek
200 ↔ 267 ↔ 334 -- Crooks Mountain
200 ↔ 267 ↔ 334 -- Dishpan Butte
200 ↔ 267 ↔ 334 -- Green Mountain
200 ↔ 267 ↔ 334 -- Muskrat Basin
200 ↔ 267 ↔ 334 -- Rock Creek

1,400 ↔ 1,870 ↔ 2,338 -- Lander HMAs P^3

Note that the P^3s for the Green Mountain and Muskrat Basin HMAs would increase relatively little. They, along with th
would be brought into compliance with up-to-date scientific thought concerning adequate herd size. These proper popul
would be foundational to Lander's new Best Management Practices (BMPs) relative to protecting and preserving its wil

Acres per wild horse:

Using the new P^3 system on the 587,333 acres available ...

251 ↔ 420 acres per wild horse

which means they would continue to be more dispersed than are livestock.

The AUMs allotted to wild horses would increase correspondingly. Livestock AUMs would be unaffected because ther
unused AUMs and because the beef industry sector continues to decline. Here are the new values -- low to high -- of wi
surcharges -- per the P^3 reformed method for setting wild horse herd sizes.

The P^3 AUMs for the Lander HMAs:

16,800 ↔ 28,056

The lower bound of AUMs allotted to wild horses would increase thusly:

7,380 -- minimum level they are at now
9,420 -- increase due to P^3 scientific setting

16,800 -- new P^3 baseline AUM level

The upper bound of AUMs alotted to wild horses would increase thusly:

12,036 -- maximum level they are at now
16,020 -- increase due to P^3 scientific setting

28,056 -- new P³ maximum AUM level

Please Fence Me In

One of the goals of BLM's preferred Alternative D is to "remove or modify existing fences to allow free movements am opportunities arise" (Record # 4120, Vol 1, pdf-page 177). Alternative B would not wait around for "opportunities" but which would surely meet with strong resistance from the livestock operators. Alternatives A and C are identical -- they impacts on herd health, including genetic diversity, when making management decisions regarding fencing." In other w would generally keep the fences.

Lander claims fence removal -- even if done only "as opportunities arise" -- is the key to promote genetic diversity and p BLM's contention valid? BLM's theoretical scenario seems more likely to constitute a subterfuge -- a way to suppress th appearing to promote diversity through fence removal. Here's why.

Currently, there are many fences blocking wild horse movements and migrations, including but not limited to ...

- HMA boundary fences,
- Livestock fences,
- Exclusionary fences to protect riparian areas,
- Private property fences,
- ROW corridor fences,
- Barrier fences around mining and drilling sites, and
- Safety fences along highways.

However, the only fences from the above list whose removal is under BLM's power to effect are the boundary fences fo degree, the livestock fences. Further, permit-holders can keep any fences in place that are pursuant to a Comprehensive agreements are actively promoted by BLM. The impression is that BLM is using carrot-and-stick methods to coerce liv onto the Strategy in order to keep their fences. Moreover, livestock producers need fences for a number of management

- Keep their animals on their own allotments,
- Manage and protect their herds,
- Rotate their livestock to fresh "pastures" when the current one is eaten down,
- Prevent overgrazing, erosion, and weed proliferation, and
- Move their animals to a clean area when the current one has a buildup of manure.

Indeed, the RMP warns: "Reduction of fences would adversely impact livestock grazing because livestock would not di congregate in some riparian-wetland areas. Livestock could move outside their traditional use areas and might even cro fences were removed or modified." See Vol 2, pdf-page 484.

So the livestock fences are surely here to stay. Again, all the permit-holders have to do is to agree to a Comprehensive C also be noted that in the years 1985-2009, the Lander Field Office itself erected **355 miles of pasture-division fences** as Obviously there are many barriers to wild horse movement. See Vol 1, pdf-page 499.

Now we're down to just the HMA boundary fences which, if eliminated, would allow the wild horses to move not just in **outside the HMAs**. Livestock operators would complain that the wild horses were invading their allotments and eating horses were just passing through or visiting temporarily, once caught outside the HMAs they would be subject to immed from the range. Thus, fence removal becomes a trap for wild horses.

Therefore, HMA boundary fences would seem essential to ensure that wild horses stay, to the extent possible, within the protect them from unfair deprival of freedom. Thus, HMA boundary fences are necessary and must be maintained. The genetic diversity and viability is **to increase herd size**. Thus, such a recommendation has been made for Record # 4110

Scenic Loops -- For the Mustangs, or for Local Recreation and the Local Economy?

The draft RMP proposes to improve or actually pave existing roads through three of the HMAs. Lander indicates that th local recreation use as wild-horse viewing loops. The HMAs in question are:

- Antelope Hills
- Dishpan Butte
- Muskrat Basin

There are reasons for concern. According to Lander's Analysis of the Management Situation (AMS), the paving of road establish self-guided scenic loops could provide additional recreational opportunities for local communities and help co See pdf-page 229, lines 20-22 of the AMS.

Surely wild horse advocates were hoping that scenic loops would promote more passive recreation such as eco-tourism, the country and perhaps from around the world to observe and learn about the mustangs, thus winning greater public sup Burro Program. If the local economies were to benefit from increased tourism, fine; but encouraging local residents to u recreational pursuits -- especially **in the absence of BLM patrols**, as the RMP admits -- could invite all kinds of disrupt frighten the horses. If the primary goal is to cater to local residents' recreational pursuits, such a goal may not benefit th

Scenic Loops -- Tourist Attractions v. Attractive Nuisances

Promoting wild-horse viewing is desirable, but improved roads could enable hooligans to chase or otherwise harass the report of just such abusive behavior, resulting in the death of a mustang in Nevada.

- http://www.rgj.com/article/20111231/NEWS01/201010313/Horse-dies-after-dirt-bike-chase

Other disruptive recreational uses, authorized or not, are bound to take place if roads are paved. Please see the article li accompanying photos showing what can happen when an erstwhile quiet nature area becomes a tourist magnet. Note in article the idea of subcontracting recreational management to the Parks Service, which has much more experience and e public and is more customer-service oriented.

- http://www.hcn.org/blogs/goat/trampled-by-tourists?utm_source=wcn1&utm_medium=email

Lander needs to rethink the scenic loops -- or should we say scenic ***loos***? If Lander does choose that Alternative, strong activities need to be taken. Those might include:

- **Daytime-only passes**; or a permit system, with **gate-restricted access**.

- Entry only via scheduled **tram tours**, hosted by BLM Wild Horse Specialists, or ...
- Entry via a licensed, permitted **outfitter** -- for an escorted horseback tour.
- Substantial **fees** to discourage entry by irresponsible parties.
- Letting the **Parks Service** manage the scenic loops.

Webcams Instead of Roads

Rather than paving roads through HMAs, Lander should consider installing live-streaming Webcams so that people fron to Lander's Website and watch the wild horses going about their natural behaviors any time of day. Siting of the camera the viewing opportunities. The cameras could also pan the landscape.

Protecting the wild horses from disturbance is the priority. Webcams reduce disturbances of every variety and prevent u what should be a wilderness environment. Webcams would allow many more virtual "visitors" to observe the wild hors to show usage levels for wild horse viewing. Such observers would be drawn to make real treks to the Lander area to vi close-and-personal. They would be more likely to plan vacation trips to ...

- Stop in Lander and stay awhile;
- Avail themselves of the services of an outfitter, thus supporting the tourism sector;
- Spend money in the local community on motels, restaurants, retail shops, etc.

If BLM-Lander wishes to help both the wild horses and the local residents, promoting the right kind of tourism is essent

Wind Energy Projects -- Rights of Way (ROW) -- and Designated Avoidance and Exclusion Areas

Lander's draft RMP declares its concern that the presence of turbines and transmission lines in HMAs could cause the w

- Move away from the vicinity of the wind-energy projects,
- Concentrate in certain areas, causing over-grazing of the range, and possibly
- Take up residence outside the HMAs.

But is this "concern" authentic? While the mustangs might initially be fearful of the disturbances caused by the installat wouldn't they eventually become habituated to the structures when they determined there was no threat to themselves? wouldn't they return to their familiar ranges?

Then Lander makes a startling claim: Wild horses cannot be managed unless wind energy projects are carefully sited. reason: Helicopters cannot be used around turbines and transmission lines. It would not be safe. Thus, wind energy pro ability to manage wild horses within the HMAs." In BLM's view, helicopters and other aircraft are essential component BLM believes it's impossible to inventory or round up horses without helicopters! Lander appears mostly concerned ab make use of the federal aircraft services contract rather than horse welfare.

A possible advantage to the wild horses could be realized, however, by the presence of turbines. If helicopters cou would need to adopt the kinder-gentler approach that wild horse advocates have long been urging -- **bait trapping**. Wit fences secured, the horses would already be contained, making it easy to lure them into traps with food. Family bands w way, resulting in less stress for the horses.

In light of these considerations, the suggested recommended action proposed herein for Record # 4119 is to allow wind

contrary to Lander's "common to all Alternatives" approach of keeping them out of the HMAs. Selection of either Alter would tend to impede BLM's ability to conduct helicopter roundups but serve to encourage the Agency to transition to h bait-trapping. Turbines may thus be beneficial to the wild horses. So the true creatures of concern about possible risks s

Livestock Population Management -- Current and Recent-Historical

Lander currently permits livestock grazing on 2,324,934 acres, which is about 97.1 percent of its BLM-managed surface percentage correspond to Alternative A (current management) as well as to Alternative C (maximum production). Here with their respective percentage of BLM-administered surface land that to be used for grazing.

Alternative A -- **97.1** percent
Alternative B -- **96.6** percent
Alternative C -- **97.1** percent -- same as A
Alternative D -- **96.8** percent

As is readily apparent, there are no significant differences across Alternatives in regard to acres open to livestock grazin other management actions that result in more or fewer AUMs being available to permit-holders.

Livestock AUMs Permitted: Either ...

279,000 (Vol. 1, pdf-page 495) ... or ...

280,813 (Vol. 3, pdf-pages 175-176).

Permitted Cow+Calf Year-Round Equivalencies:

Dividing by 12, we get either ...

23,250 ... or ...

23,346

Thus, permitted livestock outnumber the high end of the total wild horse herd level by about **23 to 1**.

Acres per Permitted Cow+Calf Year-Round Equivalency:

Dividing total grazing surface area -- 2,324,934 --

by either 23,250 or 23,346 we get approximately

100 acres per cow+calf

How Is Authorized Grazing Use Determined?

From what I have been able to determine, BLM requires permit-holders to submit **Form 4130-5 "Actual Grazing Use I** document solicits pasture names, dates on which livestock were put in and taken out, how many, and what kinds (cattle,

holders' self-reported data, BLM calculates the number of AUMs involved and bills accordingly. The permit-holders pa become "authorized."

Authorized Livestock AUMs -- Historical Averages

Lander's **20-year average** annual **authorized** livestock AUMs,1989-2008, are either ...

204,507 -- per Table K.6, Vol. 3, pdf-page 167; and per Vol. 1 pdf-page 440 ... or ...

204,993 -- per Table 4.32, "Initial Actual AUMs" cells, Vol. 2, pdf-page 476

-- in either case, roughly **73 percent** of those permitted.

Authorized Cow+Calf Year-Round Equivalencies:

Dividing by 12, we get either ...

17,042 ... or ...

17,083

Thus, actual livestock equivalencies, on average, have outnumbered the high end of the total wild horse allowed herd lev basis, by

17 to 1.

However, cattle graze only certain months of the year; meaning that during the grazing seasons, many times the yearly-e would be present.

Acres per Authorized Cow+Calf Year-Round Equivalency:

Dividing total grazing surface area -- 2,324,934 --

by either 17,042 or 17,083 we get approximately

136 acres per cow+calf

Recent Trends in Authorized AUM Use

Lander's 20-year record of authorized grazing data stops with 2008. Looking at just 2004-2008, inclusive -- the **five mo** reported in Table K.6 (see pdf-page 167) -- we see that the average actual-billed-paid-authorized AUMs have declined s hovering around **60 percent**, well below the 20-year average.

Average Authorized AUMs (2004-2008, inclusive):

167,793 -- or about 60 percent of those permitted

Authorized Cow+Calf Year-Round Equivalencies (2004-2008, inclusive):

Dividing by 12 gives us

13,983 year-round cow+calf equivalencies.

Thus, per the most recent five years of data, livestock outnumbered wild horses by nearly

14 to 1

Acres per Authorized Cow+Calf Year-Round Equivalency (2004-2008, inclusive):

Dividing total grazing surface area -- 2,324,934 --

by 13,983 we get approximately

166 acres per cow+calf

By Alternative -- Acres, AUMs, Cow+Calf Annual Equivalents, Acres per Cow+Calf

Alternative **A**:

Acres: 2,324,934
Permitted AUMs: 279,399
Cow+Calf Annual Equivalents: 23,283
Acres per Cow+Calf: **100**
Ratio of Cow+Calf Equivalents to high-end of **current** herd level (1,003): **23 to 1**
Ratio of Cow+Calf Equivalents to high-end of **P³** wild horse level (2,338): **10 to 1**

Alternative **B**:

Acres: 2,312,095
Permitted AUMs: 128,759
Cow+Calf Annual Equivalents: 10,730
Acres per Cow+Calf: **216**
Ratio of Cow+Calf Equivalents to high-end of **current** herd level (1,003): **11 to 1**
Ratio of Cow+Calf Equivalents to high-end of **P³** wild horse level (2,338): **5 to 1**

Alternative **C**:

Acres: 2,324,934 -- Same as Alternative A
Permitted AUMs: 250,491
Cow+Calf Annual Equivalents: 20,874
Acres per Cow+Calf: **111**

Ratio of Cow+Calf Equivalents to high-end of current herd level (1,003): **21 to 1**
Ratio of Cow+Calf Equivalents to high-end of P^3 wild horse level (2,338): **9 to 1**

Alternative **D**:

Acres: 2,318,621
Permitted AUMs: 229,005
Cow+Calf Annual Equivalents: 19,084
Acres per Cow+Calf: **122**
Ratio of Cow+Calf Equivalents to high-end of current herd level (1,003): **19 to 1**
Ratio of Cow+Calf Equivalents to high-end of P^3 wild horse level (2,338): **8 to 1**

In contrast, wild horses are more widely dispersed. For reference, the figures are provided again:

Current acres per wild horse, all Alternatives: **586 ↔ 955** (high to low)

P^3 reformed acres per wild horse, all Alternatives: **251 ↔ 420** (high to low)

Supposed "Loss" of Livestock AUMs Is Overstated

Table 4.32 "Estimated Reduction in AUMs by Alternative" (Vol 2, pdf-page 476) and Table L.8 "Estimated AUMs by A
176) appear appear to contain incorrect and misleading information. Both purport to show the loss of permitted and actu
life of the new RMP, depending on which Alternative is selected.

The top half of the table ("Initial Permitted AUMs") seems in good order as far as the computations go. We dare to hop
permitted AUMs has been determined for each Alternative using a valid methodology. However, the assumptions for A
have been gloomier than necessary. So many range improvements will already be in place by the time the RMP takes e
projects may not impact grazing opportunities as much as Lander fears.

The upper part of Tables 4.32 and L.8 shows ...

Initial permitted AUMs (280,813)
− Assumed Loss of AUMs per Alternative (varies)

= Net AUMs Permitted for A, B, C, or D.

The new number of permitted grazing AUMs upon promulgation of the RMP could be either ...

Alternative A: 279,399
Alternative B: 128,759
Alternative C: 250,491
Alternative D: 229,005

The bottom half of the tables is where the charts go off the rails. First, a higher number of "initial actual AUMs" than pe
Months Authorized, 1989-2008" (Vol 3, pdf-page 167) is the starting point for each Alternative -- 204,993 versus 204,5
simply multiplying permitted AUMs by 73%. Lander evidently felt this was "close enough for government work" becau

-- although lower, also rounds to 73 percent of permitted AUMs. However, neither reflects the 2008 actual level of use to **60 percent** of permitted AUMs. In fact, the five-most-recent-years' average -- **167,793** -- also rounds to **60 percent**. higher average use -- the 20-year average of 73 percent -- is unrealistic.

Based on currently-trending usage levels, only Alternative **B** would require permit-holders to reduce their AUMs over ti D, the current usage level divided by the net permitted AUMs would be as follows:

Alternative A: 167,170 ÷ 279,399 ≈ 60 percent
Alternative C: 167,170 ÷ 250,491 ≈ 67 percent
Alternative D: 167,170 ÷ 229,005 ≈ 73 percent

Livestock operators would hardly notice a difference. Even though permitted AUMs were lower, actual use is still much operations. Ever.

If Alternative B were selected -- as is herein recommended -- permit-holders would not have to reduce their actua for nearly 15 years! Permitted (not actual) AUMs would decline gradually over the 20-year life of the RMP -- 7,603 A annual cow+calf equivalents. It would take just under 15 years before permitted AUMs would equal actual AUMs.

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  280,813
−  167,170
---------------------
=  113,643 ÷ 7,603 ≈ 15
```

Once the 15-year mark was reached, thereafter permit-holders would be required to relinquish AUMs. But across so ma would scarcely be noticed. Beef production will likely continue its trend downward, which could extend the time before would need to be imposed. Please note that, contrary to Lander's "estimate," use would not increase but stay the same (scenario. The diminishing number of permitted AUMs would just result in actual AUMs being a larger percentage of th

Livestock Grazing Usage Rates -- Discrepancies in Way Represented

Record # 6064 (Vol 1, pdf-page 208) reports that **the current allotment stocking rate** -- represented by Alternative **A** - with a **moderate** (**41-60 percent**) utilization level." But this assertion is contradicted by Table K.6 -- "Animal unit Mon which shows that the historical stocking rate has averaged **73 percent, a high utilization level**.

Further, Table L.8 (found in Volume 3, pdf-page 176) predicts that usage will average 73 percent of permitted AUMs ex Lander incorrectly "estimates" usage as rising to 95 percent. Please see discussion above in this regard.

Grazing Allotments -- Most Not Assessed per Rangeland Health Standards

At the time the draft RMP was compiled, approximately 45 percent -- which would be about 1,046,220 acres -- of the pl rangeland health assessment. Reportedly more than half of the allotments evaluated -- 584,195 acres -- failed to meet st identified as the causal factor. (Vol 1, pdf-pages 499-500) There are two salient issues in this regard:

- BLM needs to assemble a task force to complete the rangeland assessments before promulgating the RMP. The staff from other offices to assist Lander in this regard.

- BLM needs to take decisive action to reduce livestock grazing significantly over the life of the new RMP. Thus,

recommended.

BLM Discussion of Range Improvements on Public Lands

The draft RMP reflects Lander's intensive use of range improvements, a major one being watering stations. At the link l
accompanying fact sheet document on such structures. Note how visually prominent they are, and how much scarce w
evaporation. Further, operators commonly shut down pumps when not grazing cattle, so those water sources are no lor
wild horses during such periods.

- http://www.blm.gov/wo/st/en/prog/grazing.print.html

Lander should transition to a different approach. Rain and snow catchment devices, commonly referred to as "**guzzlers**,
installed throughout the subject HMAs and grazing allotments. Guzzlers capture, conserve, and release water, much lik
are long-lived and require little maintenance, especially if constructed of cement. They also reduce the need to haul wat
there be a severe drought. Guzzlers come in all sizes and configurations. Those with a 10,000-gallon storage tank can s
animals. Large guzzlers can be buried underground, thus preserving wilderness vistas

In Lander's Summary of the Analysis of the Management Situation (pdf-page 187), it is noted that while current approac
stock water reservoirs, such devices lead to **evaporative loss**. Given recurrent droughts, this disadvantage is significant
mention the fact that coverless stock tanks are **dangerous traps** for birds and other wildlife. Small animals fall in and, u
corpses pollute the water. Here is the link to a timely article in this regard.

- http://www.hcn.org/blogs/goat/making-memories-one-stock-tank-at-a-time?utm_source=wcn1&utm_medium=e
  stock-tanks as traps

Guzzlers, in contrast, have covers that reduce evaporation and keep wildlife safe. Installment of guzzlers are therefore r

Livestock Production -- Business Sector Outlook 2010

Although the draft RMP assumes demand for public land grazing use will remain "static", the livestock industry sector i
National Cattlemen's Beef Association's (NCBA) "Cattlemen to Cattlemen" program that aired on September 7, 2010 or
holding back their heifers to become part of their cow herds for future growth. The principal reasons given for this deci

- Many operators are getting out of the business,
- Young people are not getting into the business [beef producers' average age: 58], and
- General economic conditions are poor.

The program noted that it takes three years to build a cow herd; so this trend is likely to be long-lasting.

Livestock Production -- Business Sector Outlook 2011

How do things look now? According to the "Cattlemen to Cattlemen" program that aired on November 1, 2011 on RFD

"mamma cows" are expected ot be "liquidated" in the coming months. The southern regions of the United States c prolonged drought. Large numbers of cattle have been sent to feed lots and slaughter due to the lack of forage and wate **adding an extra $150 per head to producer costs**. Although prices for beef products have risen, sales have sagged he NCBA's panel of experts implored producers to hang onto their cows and stay in the game because global demand for b ***the coming decades***. Recent free-trade agreements were cited as providing **eventual** access to foreign markets. Howev more stringent -- and costly -- demands on imported meat. For instance, the requirement for age-and-source verificatio according to the NCBA panel, **add $30 to $45 per head to costs**.

The questions are: Can American beef producers nearing retirement age ...

- Wait for decades for the global demand for beef to increase,
- Survive financially during the prolonged drought,
- Absorb the higher costs of doing business, and
- Meet the new market standards for ASV?

IMPLAN and WinEquus -- Both Based on Assumptions

Development of Lander's RMP has included use of IMPLAN -- **IM**pact analysis for **PLAN**ning, a data and software too analysis. The proposed Alternatives were analyzed using this economic modeling system. IMPLAN could be compare BLM uses for projections: **WinEquus**. Both programs conduct their analyses per **assumptions** which, if flawed, lead t programming itself can have apparent internal processing errors. Impossible results have been generated by WinEquus, herd levels at the end of 20 years, despite regularly-scheduled gathers to the low end of herd levels and PZP treatments. assumptions, user-skills, or software -- maybe all of the above. The danger of employing modeling software is that it cl "proofiness" and "truthiness," leading the public to believe that the projections are real and certain, when they may be a

Here is a link to **a recent concern regarding IMPLAN's producing different results from the same data**. The answ reflects the sensitivity of the system and the possibility of software problems. The take-away: IMPLAN is a useful tool of input assumptions, the user's strict adherence to established procedures, and the absence of programming errors. Ima re-run -- the discrepancies might never have been caught.

- http://implan.com/v4/index.php/V4/images/stories/videos/v3/index.php?option=com_kunena&func=view&catid

Certain assumptions made by Lander about wild horse management and about livestock grazing appear questionable. T be wrong. Further, the RMP does not reveal who ran the models, whether these parties were free of conflict of interest, experience they had with IMPLAN. Were the models tested for consistency of results?

IMPLAN -- Livestock Grazing -- False Assumptions and Erroneous Projections

Section L.4 of the RMP discusses the assumptions used to conduct the economic impact analysis of livestock grazing vi projections and conclusions are also provided (see Vol 3, pdf-page 174-177).

A review of the input-assumptions with which Lander staff performed the IMPLAN modeling for livestock grazing disc confounded the forecasts for the various Alternatives. These matters need to be addressed and resolved. Otherwise, the than Potemkin numbers -- proofiness without proof. Such forecasts do not pass muster.

- Lander projects future actual use of AUMs on the 20-year historical average (1989-2008) -- **73 percent** of permi interesting statistic, the long-term average fails to take into account how the industry sector is trending. The ans

last ten-years' average (1999-2008) in this regard dropped to about **66 percent**, while in the final five-year perio
to around **60 percent**. See discussion elsewhere in this review on the outlook for the beef industry sector.

- Contrary to Lander's assumptions, actual use of AUMs involves more factors than the few considered in the draf
decline for a variety of reasons that should have been factored into the analysis but evidently were not. Thus, sig
not considered.

- The economic analysis used a baseline of **204,993** AUMs (Vol 3, pdf-pages 175-176) while other math-checked
as Table K.6 also in Vol 3, pdf-page 167) indicated that baseline figure was **204,507**. While the rounded-up perc
same using either number as the dividend, it is disturbing to find such **inconsistencies** and suggests there may be
operative. Further, use of the larger number in Table L.8 gives the false impression of a greater reduction in AU
case.

- Lander "believes" that Alternative B (the resource conservation, environmentally-friendly option) would prompt
increase actual use relative to permitted use, leading to a 95 percent actual-to-permitted use by the year 2027. W
The percentage of used AUMs to permitted AUMs would increase even if use stayed constant.

- Lander estimates that under Alternative B a significant decrease in AUMs would result because pastures farther
source "would not be included in BLM-authorized AUMs ..." and because BLM would not build watering facilit
However, the RMP elsewhere suggests (see Vol. 2, pdf-page 484) that the vast majority of the area already has w
because two miles is the "maximum distance livestock will walk to obtain water." Thus, logically, cattle operato
ensure adequate placement of watering devices lest their charges perish of thirst. Further, Lander itself claims to
"53 stock reservoirs, 38 spring developments, 76 stock water wells, [and] 110 miles of stock water pipeline ..." (
of the fact that such range improvements are likely to be ongoing to-date, by the time the new RMP is promulgat
fully supplied with livestock watering stations. Indeed, Lander recently announced that four new livestock water
Antelope Hills allotment to improve cattle distribution. Thus, the assumption of a lack of near-enough watering
conclusion regarding loss of AUMs is too.

- In Table 2.30 -- 6000 Land Resources -- Livestock Grazing Management (Vol 1, pdf-page 208), Record # 6064 s
stocking rates for Alternatives A, C, and D to be at the **moderate level -- 41-60-percent utilization level**, excep
forecast to have a light -- 21-40-percent utilization level. **These stocking rates do not agree with the IMPLAN**
Table L.8, which indicate a 73-percent utilization rate except for Alternative B, which is projected to have

Oil and Gas Drilling and Fracking -- and Groundwater Contamination

Lander's Sage-Grouse core areas have "gas patches" to preserve those fields with greatest extractive potential, never mir
Grouse core areas encompass most of the HMAs, three show some incursion by gas patches:

- **Conant Creek**

- **Green Mountain** -- affected the most
- **Muskrat Basin**

The Environmental Protection Agency (EPA) recently issued a report on the source of contamination of groundwater in **is near the Lander planning area**. Pavillion has many natural gas hydraulic fracking projects. The test results suggest pollution was migration into the aquifer by chemicals used in the fracking process. The EPA advised Pavillion residents several precautionary steps, including using alternate sources of water for drinking and cooking, and ventilation when sh

Uranium Mining

Uranium mining and processing activities introduce a multitude of adverse environmental effects. Per inspection and co maps, uranium mining appears to take place in four of Lander's HMAs. The affected HMAs are:

- Antelope Hills
- Dishpan Butte
- Green Mountain
- Muskrat Basin.

Wind Energy Projects -- Seem Preferable to Drilling, Fracking, and Mining Projects

There are drawbacks to virtually all forms of energy projects, but some are worse than others. First, the extractive proje **water**, a scarce commodity in arid Wyoming. Further, the resulting "produced" water is full of toxic substances such as that can endanger wildlife, including wild horses. Air pollution from gas wells, radiation from uranium mining and proc devastation from strip mining do untold damage. Noise pollution is significant. Access roads, heavy vehicles such as tr equipment, and personnel to build, operate, and manage the aforementioned disturb what would otherwise be peaceful a issue then, is where, not whether.

As High Country News reported earlier this year (link below), BLM doesn't appear to care about wildlife that stand in th exploitation. The air pollution and water contamination caused by gas wells are widely known. Note how BLM dances a and twists its meaning.

- http://www.hcn.org/issues/43.5/blm-stays-course-in-wyoming-gaspatch-despite-mule-deer-decline

Wind energy ***potential*** exists to some extent in all of Lander's HMAs. Wind energy's impact is comparatively less delet likely to be authorized in light of the push for energy independence. It does not seem to be an issue of ***whether*** there wi ***where*** they will be sited.

Wind Energy Projects -- Minimizing Risks to Winged Wildlife

Being a renewable, clean energy source, wind turbines offer many advantages. However, the turbines and associated tra to birds and bats. Wind energy structures need, at the very least, to be sited

- Away from riparian and wetland areas
- Out of flight paths of winged wildlife

Also, some turbine designs are less lethal to birds and bats.

The article below, which is pertinent to Wyoming and public lands, discusses these issues. If the risks can be acceptably wind energy projects might be a good thing overall for the environment and its resident and visiting wildlife. Although would seem preferable to the air and water pollution caused by gas and oil wells, better than the habitat destruction from better than the radioactive waste from uranium extraction and processing facilities. Careful research would have to go i make conditions as safe as possible for birds and bats, which are important to a thriving natural ecological balance and d have -- their needs considered.

- http://www.therepublic.com/view/story/b5085a3c78914393b2859754829c6ff2/WY--Wind-Farms-Birds/

The American Wind Wildlife Institute seeks to provide solid scientific data and support in proper siting of turbines and p AWWI's Website:

- http://www.awwi.org/

Draft Biological Assessment

On December 5, 2011, Lander posted a Draft Biological Assessment to its Lander RMP Revision Documents page. The management addresses how such management may impact conservation of other identified animal and plant species, suc and the desert yellowhead. There were two areas of concern for mustang advocates:

1. BLM claims (on pdf-page 138) that **no specific best management practices (BMPs) apply to wild horse managen** deficiencies in the Lander RMP planning process --

- Failure to develop BMPs in regard to wild horse management and
- Failure to cultivate partnerships with constituent wild horse stakeholders to formulate BMPs.

The goal should be **coordinated resource management** (**CRM**) -- **conferring, consulting, and coordinating** with the leads to consensus-based decisions regarding best practices for -- in this instance -- managing wild horses. BLM could a antagonizing this constituency if it would have advocates participate as true partners in developing the BMPs.

2. BLM cautions (on pdf-page 140) that the increased human presence from recreation on the proposed **scenic loop roa** may lead to cumulative impact on threatened and endangered species. Wild horse viewing may include **more travel on travel, and camping** in areas where threatened and endangered species occur, adding to disturbance of these species." support the recommendation for Record # 4120 ***not to have scenic loop roads***.

The Assessment also discusses livestock grazing, and (on pdf-page 165) lists as one of the proposed actions to "**remove cattleguards on a case-by-case basis** to facilitate livestock, wild horses, and wildlife movement and management while values." Thus, fence removal is not intended as an across-the-board endeavor but one in which each fence removal or m evaluated. Given that cattle operators can keep their fences as long as they agree to participate in a Comprehensive Graz likely to come down. Indeed, (on pdf-page 169) under "Cumulative Effects," BLM warns: "Livestock grazing actions in developments (e.g., wells, pipelines, reservoirs, spring developments) [that] can result in the loss, degradation, and/or fra threatened and endangered species." This statement points to fences staying up and the supposed genetic exchange amo blocked. Solution: **Increase herd sizes to at least 200 ↔ 334 individuals per HMA**.

Finally, Table 3 (on pdf-page 192) -- Summary of Effects Determinations for Threatened and Endangered Species -- erro
LAA, that the presence of wild horses "may affect, is likely to adversely affect" the desert yellowhead. However, the na
species (pdf-page 139) contradicts that assertion, pointing out that grazing by wild horses "may remove competing palat
otherwise compete with the desert yellowhead plants." Thus, wild horses actually ***help*** the yellowhead survive. Further
narrative notes: "Implementation of wild horse management ***may affect, but is not likely to adversely affect the desert y***
to insignificant effects (NLAA-i)." [Italics in original; bold type added by me.] For these reasons, Lander should amen
Assessment to reflect "**NLAA-b**" or "**NLAA-i**" -- "may affect, but is not likely to adversely affect, due to beneficial, ins
regard to wild horse impact on desert yellowhead.

Record Identification Numbers and Suggested Recommendations

Table 2.22. **4000** Biological Resources (BR) -- **Wild Horses** presents a chart of the **record numbers** and associated "**m**
corresponding to each of the proffered **Alternatives**. Here they are, along with suggested comments and their rationales
through 4119 are said to be "common to all alternatives." Only Record Numbers 4120 -- scenic loops -- and 4121 -- fen
degree across Alternatives. Also included are recommendations concerning Record Numbers for other objectives that c

Record # 41**10** -- *Appropriate Management Levels for Wild Horses*

Recommend: Declare intent to transition from the obsolete "appropriate management levels" to new **proper populatio**
of raising the P³s in each HMA to at least **200 ↔ 334** and higher where possible. HMAs shall be ***principally*** for wild ho
Decree expires in August 2013, BLM shall move forward promptly to establish P³s that will allow the herd in each HMA
self-sustaining. Gradually increase the respective herds' population so that compliance is achieved within 10 years. **Ab**
surcharge on wild horses. Reinstate all previously zeroed-out herd areas (HAs) and allow them to become repopulated
principally for, wild horses.

Reasons: Current appropriate management levels, set nearly 20 years ago, have been invalidated by subsequent scientif
increase significantly. Genetic diversity is more likely to result from optimal population levels rather than minimal ones
with the Act and the CFR et al. regarding thriving, self-sustaining herds. With beef production in decline, grazing intere
relatively minor increases in wild horse herd populations. The 15-percent AUM surcharge imposed on wild horses does
methodology for determining AUM use and is deemed a subterfuge to keep herd sizes down. The RMP failed to addres
restoration as HMAs.

Record # 41**11** -- *Population Control Measures to Be Used on Wild Horses*

Recommend: Only ***completely-reversible*** contraceptives shall be used. No disfiguring freeze-brands on hips. No geldi
protect native predators to re-establish a thriving, natural ecological balance.

Reasons: Preserve fertility, genetic diversity. Large, hideous freeze-brands ruin adoption prospects. No TNEB without

Record # 41**12** -- *Dealing with Wild Horse Outsiders*

Recommend: ***Return*** horses found outside HMAs to the HMA from which they escaped. ***Secure boundary fences***. ***Lo***

Reasons: Wild horses will roam -- it is their nature. To prevent their straying outside the HMAs, the boundaries must b

Record # 41**13** -- *Selective Removal Criteria for Wild Horses*

Recommend: Roundups and removals shall ***preserve wild horse family units*** at all costs. Spanish phenotype is importa

Reasons: Family bonds are more important in wild horse society than are good looks. Keep the families together.

Record # 41**14** -- *Use of So-Called Monitoring and Evaluation Data for HMAs*

Recommend: Use ***independent census takers*** and ***scientific methods*** for counting wild horses. Abandon dependence o extrapolations to project population growth.

Reasons: Curent approach has proven unreliable. Inflated estimates of wild horse populations have led to unnecessary r impaired relations with grazing permit-holders.

Record # 41**15** -- *Wild Horse Health Monitoring*

Recommend: ***Explain*** how BLM proposes to monitor horse health. Clarify how veterinary aid will be rendered. Set fo ***DNA sampling and testing at every gather*** to track the genetic diversity status of each herd. Stipulate that the HMAP w herd populations if DNA test results reflect declining gene-pool diversity.

Reasons: Expert DNA testing is crucial to evaluate herds' genetic health. Observation of body condition during an aeria method for determining genetic viability. Monitoring is not management. Monitoring is a check on management.

Record # 41**16** -- *Drop Metapopulation Theory*

Recommend: BLM shall abandon designation of the "North Lander Complex" and manage the Conant Creek, Dishpan Rock Creek HMAs as ***separate, stand-alone HMAs***. BLM shall abandon designation of the "Red Desert Complex" and Crooks Mountain, and Green Mountain HMAs also as ***separate, stand-alone HMAs***. Each HMA should have a populat number to promote a self-sustaining herd: **200 ↔ 334** individuals, minimum, with higher numbers advisable.

Reasons: The proposed administrative designation of the subject HMAs as metapopulations is unscientific and contrary horse herds at issue. Continued presence of fences precludes these HMAs from constituting true metapopulations.

Record # 41**17** -- *Year-Round Water Sources*

Recommend: Install a system of strategically-placed large, in-ground ***guzzlers*** to help maintain and conserve adequate w Require livestock permit-holders to keep their water improvements operating even when the grazing seasons are over. A for management action, the draft RMP does not detail how BLM would ensure a continuous supply of water for the wilc

Reasons: Protect riparian and wetland areas. Moreover, guzzlers have ***covers***, ***which reduce evaporation and prevent l them***, becoming trapped, and polluting the water.

Record # 41**18** -- *Updating the HMAP*

Recommend: ***Update*** the Lander HMAP ***now*** to raise the wild horse authorized management levels to **200 ↔ 334** per H metapopulation theory and the imaginary complexes.

Reasons: Genetically non-viable population levels have been in effect for too long. Act promptly to correct this inadeq

Record # 41**19** -- *Wind Energy Projects' Affect on Wild Horse Management*

Recommend: ***Promote wind-energy development in HMAs***. ***Allow ROWs in HMAs***. Here BLM has a prime opportun and to transition to humane bait-trapping instead of violent helicopter rodeos to conduct wild horse roundups.

Reasons: Clean, renewable energy avoids habitat destruction and pollution from drilling, fracking, and mining. Human expected of wild horse management professionals. BLM has embarassed itself too much for too long with its brutal heli scale annual bait-trapping gathers will prevent the horse adoption market from being overwhelmed and reduce the need

Record # 41**20** -- *Scenic Loops*

Recommend: Alternative **A** -- Do ***not*** establish scenic loops for viewing wild horses. Encourage ***outfitters and primitiv*** streaming ***Webcams*** so that people from around the world can log on to Lander's Website and watch the wild horses goi behaviors any time of day. Siting of the cameras could be done to maximize the viewing opportunities. The cameras co

Reasons: Promoting wild-horse viewing is desirable, but improved roads would enable hooligans to chase or otherwise disruptive, unauthorized recreation use is bound to take place if roads are paved. More on-road travel, potential off-road where threatened and endangered species occur could create disturbances. Webcams would allow many more virtual "v horses, and cameras would prevent unnecessary intrusions into what should be a wilderness environment. E-visitors cou levels for wild horse viewing. Responsible tourism would likely result as visitors from outside the local community trav their favorite mustangs in person -- via outfitters as guides.

Record # 41**21** -- *Fences*

Recommend: Alternative **A, *but strengthened***. ***Keep and maintain all HMA boundary fences*** in good order with ***gates*** genetic viability by increasing the authorized herd management level in each HMA to at least **200 ↔ 334**.

Reasons: As the saying goes: "Good fences make good neighbors." Fences prevent conflicts with other stakeholders. mustangs in their proper HMA, thus protecting them from removal due to their wandering into non-HMA areas. Thus, maintained fences and securely-closed gates. Keeping wild horses inside HMAs should also facilitate roundups. The sy Wild Horse and Burro Specialist Linda Coates-Markle established that isolated populations with fewer than 200 individu to loss of gene-pool diversity. Thus each HMA should have a baseline of at least 200 wild horses.

Table 2.30. **6000** Land Resources (LR) -- **Livestock Grazing Management** (Vol. 1, pdf-pages 206-209) presents a cha associated "management actions" corresponding to each of the proffered Alternatives. Here are selected ones that could recommendations and their rationales. Record Numbers 6048 through 6059 are said to be "common to all alternatives."

Record # 60**63** -- *Range Improvements*

Recommend: Install rain and snow catchment devices, commonly referred to as "***guzzlers***," throughout the subject HMA

Reasons: Lacking covers, stock reservoirs, troughs, and wells are prone to evaporative loss, which is a waste of water, a animals frequently become trapped in them. Guzzlers, in contrast, have covers that reduce evaporation and keep wildlif

Record # 60**64** -- *Utilization Levels for Livestock Grazing*

Recommend: Alternative **B**. Light utilization of 21-40 percent.

Reasons: More than half of the allotments assessed so far were not meeting rangeland health standards. Thus, as stated
to achieve an adequate residual forage standard used as cover for wildlife and to be made available for utilization by wil

Record # 60**66** -- *Fences (in connection with livestock grazing)*

Recommend: Alternative **A, *but stricter***. Corresponds to Record # 4121. ***Keep and maintain all HMA boundary fenc***
closed. Instead, increase the low value of the proper population parameters -- the **P³** -- in each HMA to at least 200 wilc

Reasons: Fences prevent conflicts with other stakeholders. Thus, HMA boundaries need well-maintained fences and se
Alternative A is the honest, credible approach to the matter of fences. Because fences are here to stay, Lander would do
and ***drop the pretense of fence removal*** that would, hypothetically, promote wild horse migration and genetic diversity.
best to deal straightforwardly with the situation.

General Recommendations

1. The Lander RMP should have a much shorter lifespan.

Although not identified as an issue, it is suggested that the new RMP should have a shorter validity period -- ***four to five***
well as political) climate change demands greater flexibility on the part of BLM to respond quickly to rapidly-developin
An RMP needs to be up-to-date and dynamic, because future actions and decisions will be guided by it. Indeed, Wyomi
Action Plan (SWAP) said: "**It is often difficult to keep Bureau of Land Management Resource Management Plans**
specific to meet the needs for effective mitigation and conservation planning." The SWAP said that "**rapidly chang**
can also cause RMPs to quickly become outdated."

In particular, Lander's new RMP should state that it is issued conditionally-in-part, depending on the findings of the repo
Academies of Science (NAS) following its study of the Wild Horse and Burro Program. The RMP should advise that it
amendment in regard to the Program, pursuant to the findings and corrective actions outlined in the NAS report.

2. Count all "votes." Strive for consensus. Publish all results.

Lander needs to count the number of comments "voting" for or against the particular management actions at issue. Cons
comments into one "form letter" and weighting them as a single submission results in distortion -- a false picture of the r
opposition to particular management actions. Collapsing the vote thwarts the intent of public participation in the RMP p
supposed to be ***building consensus***. Disregarding feedback leads to decisions that are not supported by the majority of s
place to disqualify otherwise valid comments based on what Agency staff deem an inconvenient format. As public serv
show due respect for constituents. ***All comments must be honored -- considered fully and individually, with the result***

3. Cultivate partnerships with wild horse stakeholders.

Inspection of Section 5.4 -- Distribution List -- the organizations to which Lander sent copies of the draft RMP-EIS invi
-- shows ***a conspicuous absence of any wild horse advocacy groups***. This omission surely contributed to the RMP's co

and practices for managing wild horses. Had mustang advocates been invited to participate in the planning from the star to the program could have resulted in a fresh management style. However, the only horse-related organization contacted Horsemen of America, a national non-profit organization whose Wyoming chapters " ... work with public agencies ... to for the good of recreational stock users" and their " ... historic right to use back country trails and forage areas." The gro riding on public lands. This glaring deficiency in the RMP planning process -- not reaching out to wild horse advocacy remedied.

Lander needs to implement **coordinated resource management** (**CRM**) with regard to its wild horse stakeholders. Do challenging because mustang advocates come from across the country. Happily, with modern communication technolog partnerships have fallen. BLM needs to ***cooperate, consult, and coordinate*** with mustang advocates, just as the Agency permittees. ***The CRM approach will result in consensus-based decisions and the development of best management pr horses***.

4. Complete rangeland health assessments before promulgating the RMP Revision

Lander is urged to assemble a task force to complete the rangeland health assessments before promulgating the RMP. B redeploy staff from other field offices to assist Lander in this regard.

5. Correct Certain Information in the Biological Assessment

Lander should amend Table 3 of the Biological Assessment to reflect "**NLAA-b**" or "**NLAA-i**" -- "***may affect, but is no to beneficial, insignificant ... effects***" with regard to wild horse impact on **desert yellowhead**. The Summary of Effects Threatened and Endangered Species erroneously indicates, with code LAA, that the presence of wild horses "may affect the desert yellowhead. However, the narrative for this interaction of species contradicts that assertion, pointing out that remove competing palatable vegetation which would otherwise compete with the desert yellowhead plants." Thus, wild yellowhead survive. Further, the next paragraph of the narrative notes: "***Implementation of wild horse management m adversely affect the desert yellowhead critical habitat due to insignificant effects (NLAA-i)***." [Italics in original; bold

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I urge the Lander Field Office to consider these recommendations for inclusion in the RMP Revision and EIS. Would y response to these substantive comments. Thank you.

Sincerely,

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