

GUARDIANS OF THE RANGE
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March 30, 2011

Via email:

Bureau of Land Management
Division of Wild Horses and Burros
1849 C Street, NW
Room 5665
Washington, D.C. 20240

RE: Proposed Strategy; Details of the BLM's Proposed Strategy for Future Management of America's Wild Horses and Burros; February 28, 2011

Dear Director Abbey:

The Guardians is a 501c3 non-profit dedicated to sound science and community partnership in public land management. Public land grazing is the focus area of our stewardship and interests.

Guardians submitted comments on September 2, 2010 on the draft strategy "*A Sustainable Approach for the Management of America's Wild Horses and Burros.*"

In those carefully considered comments we expressed support for those strategies we knew would help to solve some of these problems and took issue with those we deemed as counterproductive.

Unfortunately, the revised draft strategy referenced above does not reflect a number of the elements that would have moved this management effort in a direction of fair and effective herd management, and healthy resource conditions which could and should sustain multiple uses.

Almost all of our member permittees graze livestock on BLM lands and have done so in a controlled and responsible manner for decades. Their firsthand observations and knowledge of the excessive wild horse and burro populations with their year-round grazing provides them with credible insights and perspectives relative to this proposed strategy.

Guardians general comments:

- This strategy lacks a voice of balance in favor of the land resources. It simply embraces a 'general public's' emotional response to their picture of wild horses running free with the wind in their manes. The general public's vastly limited

understanding of the issue and its impacts is given far too much weight. It is as though the BLM doesn't want to disappoint a spoiled child and doesn't know how to articulate why our nation must move quickly and decisively to protect land resources for future generations of all species and users of public lands. Clearly, proponents want it all, and the BLM is willing to give it to them while pretending not to. This is patently unfair.

- **National Academy of Science Study** – Totally unnecessary. This is a delay tactic. Already existing studies and their recommendations have not been implemented.
- **Horse gathers** – Guardians do not support this. This reduction in the gathers from 10,000 to 7,600 horses per year as a way to help fund more holding facilities etc. ignores the reality of more long lasting degradation to land resources. It sends the wrong message because time is of the essence to mitigate more damage to land resources.
- **Euthanasia**: We are compelled to speak to the agency removing this from this strategy. We fully acknowledge that appropriation dollars to carry these efforts out have been severed for the present time. **Present** being the operative word. We want to see this remain as a part of the new strategy and when the time comes that these political and bureaucratic firewalls can be removed, than the agency can have another tool 'in the tool box'. The court of public opinion will turn again to understand the appropriateness of this tool, and we would ask that you not preclude it for the future.
- **Acquisition of preserves** – We totally support the decision to not move forward on this.
- **Local community support/partnerships and ecotourism elements** – This is a very, very troubling component of the strategy. Not because we don't respect the tourism industry and appreciate its benefits. It is because the agency is carrying this much too far, almost to a point of insult toward many historic cultures and enterprises of the American west. Just reflect upon all the outreach efforts, etc. and the money and attention these will take. It is overkill and clearly prejudiced against America's proud commodity multiple uses.

Comments specific to the strategy objectives:

Sustainable herds: Objective 1

We support getting the excessive populations down quickly and within the established AML, for all HMA's and HA's. This would send things down a manageable and compassionate path. Then manage to maintain the numbers.

No changes to AML should occur outside of the NEPA process, and such changes should not adversely affect other multiple uses.

Fertility control and other population measures: Objective 2

This should be only one of the humane methods to control population. We support the method but only if the agency can commit to the long-term financial resources which will be needed; and a consistent application of the method.

Implement actions to improve WH&B management within HMAs: Objective 3

The Guardians are totally opposed to utilizing livestock permits as horse permits. This speaks loud and clear to our earlier comment about proponents want it all and the agency is willing to give it to them.

What is fair about this idea? Absolutely nothing. Livestock grazing is sustainable only because numbers, time and timing, and range resources are managed every step of every season. That's the reason these allotments look so appealing to those who are looking to find more forage for more horses and burros.....because the benefits of managed use results in healthier range conditions.

The collective grazing constraints imposed by the Taylor Grazing Act, and the Federal Land Management Act, the Endangered Species Act and other legal sidebars have thankfully served to benefit our rangeland resources. Any reasonable rancher will tell you that it is near to impossible to comply with all of the rules and regulations on a grazing allotment; BUT that it is absolutely necessary to do so in order to maintain their legal right to graze livestock.

NOW the BLM would consider jeopardizing the ability of permittees to meet standard and guidelines of resource utilization by dumping unmanaged horses in the allotments. With all due respect, the only way to appropriately characterize this is with the word 'reprehensible'.

What happened to the concept of 'sharing the landscape' which is imbedded in the Multiple Use and Sustained Yield Act. In this context, however, sharing does not include pounding a landscape (allotment) with wild horses and burros on long established cattle and sheep allotments. The ecology of most BLM lands cannot and should not have to withstand uncontrolled and unmanaged WH&B. Let us be realistic, BUT more importantly let us be FAIR and ethical.

Many within the public land grazing industry realize that the BLM would like to get out of the livestock grazing business. We've heard it from BLM folks within the agency at very high levels. We've heard about the reluctance to keep fighting legal battles and losing, and that the agency is just tired of the fight. *(Lack of fiscal ability to follow through on good intentions already jeopardizes every allotment and permit renewal.)*

This willingness to further marginalize livestock operations by imposing this untenable strategy of dumping horses on cattle and sheep allotments must be recognized for what it is; A clear strategy to help push producers off of public lands because they will not be able to meet standards and guidelines, while the horses and burros are not held to such stringent guidelines. It's a convenient smoke screen to help achieve a much larger and more onerous goal. We do not deserve this.

CONCLUSION: We will leave it to others to speak to the other specifics within this strategy. We chose to conclude with remarks that reflect our two greatest concerns.

(1) Avoidance and/or abandonment of the agency's intrinsic responsibility to manage, *with a steady hand*, our nation's natural resources at a deep and sustainable level. This agency's responsibility should respect, *and with restraint*, recognize changing social values. However, the BLM should not allow its public trust and national responsibility to be abrogated, seduced or marginalized by the expression of changing social values. The agency must recognize that *changing* social values are not all that should guide an agency. Firstly, some social values are more enduring and they should not just be pushed aside because they are older and less current. Secondly, changing social values should not override national security values, economic value, cultural values or undermine legal foundations.

(2) Fiscal responsibility of solving and managing this problem is not truly reflected in this strategy. The Guardians pointed out very strongly in our September 2, 2010 comments that each and every proposed action only cost more money and produced less stewardship on the ground.

Disappointingly this proposed strategy is more of a public relations effort to deal with the clamor of romanticized public perceptions of wild horses running free. Admittedly, there are many people passionate about this issue. That is their right.

However, there are also millions of people who continue to be passionate about their rights and endeavors on these public lands and the substantive contributions their efforts provide our nation. They should not have to justify their continued existence by screaming louder and more passionately when resource management problems are being solved. Our BLM's national responsibility is to apply a management maturity which sustains our nation's needs on more than just a 'social values level'.

Sincerely,

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