

GUARDIANS OF THE RANGE

OFFICE OF EXECUTIVE DIRECTOR

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September 2, 2010

Bureau of Land Management
National Wild Horse and Burro Program
Bob Abbey, Director
Bureau of Land Management
1849 C Street NW, Rm. 5665
Washington, D.C. 20240

RE: Comments on Draft Goals, Objectives and Possible Management Actions – June 2010

Dear Director Abbey:

The Guardians of the Range (GOR) is a 501 c3 organization focused on sound science and community partnership in public land management. This organization provides information, assistance, networking and partnership opportunities for allotment holders, communities and public land managers to fairly and responsibly implement rangeland stewardship in the balanced interests of the resources, and the affected economies in the region.

This organization is prepared to assist the Bureau of Land Management (BLM) in bringing all of these resources to bear in solving the long standing and serious problem of too many feral horses and burros on our public rangelands.

Our comments will be specific to the various categories set forth in the Draft Goals, Objectives and Possible Management Actions – June 2010.

There are, however, some special introductory comments we consider equally important to the development of a final working document. We offer those special comments into consideration with the same weight and importance as our comments which are specific by category.

SPECIAL INTRODUCTORY COMMENTS

Throughout this draft document there are two glaring omissions:

- (1) A stated need for the general public to have a comprehensive and balanced understanding of ALL aspects, impacts and limitations to the management of these iconic resources.

- (2) An acknowledgement by the BLM that it has an obligation to help the public recognize and embrace the reality that management of public resources is not singular in focus nor limitless in terms of time, and money.

Throughout the draft document there are references to reaching a sustainable ecological balance between the number of horses and burros and the carrying capacity of the rangelands. Certainly this is an appropriate goal.

However, an equally appropriate goal is the attainment of the public's understanding that a sustainable economic and emotional balance must be reached if sound, reasonable and fair management of public resources is to be achieved.

Ignoring this 'tough love' messaging responsibility is not acceptable from our Bureau of Land Management. This document seeks to message only the 'soft stuff', and in so doing delivers an unintentional insult to the American public, fuels more emotions and limits understanding.

This draft document gives zero recognition to the reality that a tri-fold balance of understanding must be achieved ECOLOGICALLY, ECONOMICALLY AND EMOTIONALLY. Fairness and ethical natural resource stewardship demand no less.

The document is all about the *world* (national & global references) revolving around:

- the need to increase financial capacity to serve horses and burros,
- the need to increase grazing acreages at the implied expense of other animals and habitats,
- the need to increase public acceptance of these animals as almost sacred entities that should live almost without bounds and live for as long as we can keep them alive,
- the need to focus on ensuring *their* 'roaming capacity' with almost no expressed consideration or action items for the multitude of other species that deserve sound stewardship of their habitats – both public and private.
- the need to spend multi-millions of dollars and human resources monitoring, assessing, etc. etc. when the BLM knows full well it does not now, nor has it ever, nor will it ever have the necessary resources to do all of these grandiose ACTIONS. They sound well intended, but will only land the BLM in court when it cannot comply----just as is happening now relative to grazing allotment management plans.

Certainly the agency must recognize what it is setting itself up for, i.e., more lawsuits, more public conflict, and most importantly MORE degradation of all the natural resources involved herewith.

The draft document reads as though there is almost no other flora or fauna or other publics sharing this landscape under BLM stewardship. This is very worrisome and exacerbates the emotionally weighted public perception of the issue. The agency

should substantively incorporate other considerations into the draft proposals. To do otherwise is to portray this as a fairytale place where only horses and burros roam and management is comprised only of considerations for their benefit. Not acceptable.

COMMUNICATIONS is one of the seven **key areas** identified for the BLM's strategic planning effort. The GOR see this draft planning effort as reaching only the 50% mark because of the above stated critical omissions.

Two special observations:

On page 6 – The Secretary's Initiative: The agency uses a photo of a burro and text insert: "Did you know? The demand for burros exceeds the supply. The BLM is holding very few unadopted burros." *While this may be an accurate statement.....is seems deliberately intended to have the average public reader come away with the idea that the BLM is holding very few horses and burros.....I seriously doubt most people would pick up on the specific reference to just burros.*

Contents Page: This is the only page where we can find reference to euthanasia as a requirement and/or management option. Even on page 28 under the history (revisionist) outline of the WHB program such avoidance seems deliberate and disingenuous.

PRINCIPLES FOR SUCCESS

Draft states that each of these serve to shape the nature of the challenge the BLM faces.....page 8

The nature of the challenge the BLM faces is shaped ALSO by a lack of the public being made aware of the full management picture as discussed in our introductory comments. The fifth principle....Sustainable solutions are possible only through partnerships does not address, infer or include the 'tough love' part of the message needed. Full circle communication as a key area is hijacked!

Without a fundamental shift in how the program is managed, the number of animals the BLM is holding could grow to more than 80,000.....page 9

A fundamental shift in program management would be to fill the 50% communication void.....you are not facilitating the greater American public's help in solving these problems because they have not been given enough information to reach a balanced understanding.

IMPLICATIONS FOR STRATEGY DEVELOPMENT

What do we think?

- GOR would support increased use of fertility control and sex ratio adjustments.
- GOR does not support male-only herds in some HMAs. Such a social structure brings with it greater competition with wildlife for water and forage.

- GOR would not support, under any conditions, finding homes overseas if it involved time and resources of the BLM to comply with adoption stipulations. We strongly suggest that you humanely euthanize excess animals and stop perpetuating this myth and emotional indulgence that all animals must have homes. The end of the trail can and should come from a variety of options. Have the courage to embrace those.
- GOR would support waiving or shortening title waiting period.

DRAFT GOALS, OBJECTIVES & POSSIBLE MANAGEMENT ACTIONS

SUSTAINABLE HERDS

There would need to be a mechanism to be able to adapt AMLs to variable forage conditions. That is harder and more costly than might be doable and justified.

We strongly object to the proposed ACTIONS for Objective 2: Make additional forage available for wild horse and burro use.

It is untenable that the BLM would focus on diminishing public land livestock grazing to achieve this objective. All three of the proposed actions would do this.

Livestock grazing should not be seen as the easy target for the agency to satisfy the all consuming attitude of many WHB proponents. These insulting proposed actions only serve to underscore the lack of willingness on the part of the BLM to appropriately communicate to the public that sharing a multiple use landscape does not mean ‘take it over and out of the hands of other Americans’ through either overt or covert tactics just because the agency can’t reign in the greed of one constituency.

Additionally, these proposed actions reflect the agency’s unstated, and as yet unrecognized desire to shift away from domestic livestock grazing and toward preservation, recreation and Treasured Landscapes. These actions clearly serve that long range intent.

PRESERVES

This cannot be a successful strategy. There are other financial and management demands at the state and national levels for the conservation of native species that will and should take priority over WHB.

The GOR suggests the development of an alternative plan. We concur with the Wyoming Game and Fish when it recommends that such a plan ‘should help manage horses at lower numbers at a lower cost that combines adoption to meet actual demand, euthanasia of injured, old and sick horses that exceed adoption demand, and sterilization to help control populations. This is the only approach that will significantly reduce the cost of the program and provide a practical, sustainable solution.’

Objective 1: Manage every preserve.....

Totally unrealistic money and human resource wise.

Actions Item 3: Unrealistic. Think of the costs and human resource requirements. Our nation cannot afford this.

Objective 3: Acquire preserves through acquisition of non-federal land.

Action.....through purchase.....

Purchase with tax papers' money would be totally unacceptable. Our nation cannot and should not consider such indulgences at this time in history. Also, we question the legality of a less-than-fee title acquisition which would probably have all sorts of legal complications with ESA considerations and compliance with WHB program.

Objective 5: Create preserves on other federal agency lands.

The GOR does not support this and suggest you eliminate it. BLM should not be considering *exporting* these problems to other federal landscapes. Solve the management problems first on your own turf please!

Objective 6: Create a program for management of wild horses and burros by private citizens who would be reimbursed for their care through the USDA Farm Service Agency.

The GOR does not support this. Taxpayers are already footing an obscene amount of money for the WHB program. It is inappropriate to keep reaching out to other landscapes and revenue streams to subsidize management problems that should be rectified----NOT subsidized in perpetuity.

Action No. 1: Explore existing USDA private land conservation.....

The GOR does not support this.....it clearly smacks of a potential mechanism to intimidate farmers and ranchers to provide care for excess animals if they want to be approved for programs.....incentives would soon become requirements.....intended or unintended.

Action No. 2: If necessary, seek new authorities to create a new private land conservation program; facilitate and manage the program consistent with the authority provided.

The GOR does not support this expansion of authority. Enough is enough. The agency needs to look to fine tuning the program but not expanding it at every turn. Fully use the authorities you already have----such as euthanasia. The public needs to know that *appropriation of funds* is being used to hinder both management and the humane treatment of old, sick and unadoptable animals.

Objective 7: Create preserves on HAs or HMA which currently have no animals on them.

The GOR does not support this. The document states that preserves would be places where the forage is rich-----where unadopted wild horses can roam as freely as possible. Supposedly this would eventually limit gathers to the number of horses that can be adopted. Please recognize that moving unadopted wild horses to 'preserves' does not really solve the problem of the costs you'd incur in monitoring and managing every preserve..... This Preserve idea is something like a shell game.....you are just moving things around in a

costly and unproductive manner. Take decisive action and humanely eliminate the unadopted animals for their sake and the sake of many landscapes.

TREASURED HERDS

The GOR is not in any way, shape or fashion supportive of this concept. It is totally unnecessary and inappropriate. These animals were relegated long ago to a special place in American society when the WHB legislation was passed. We do not need to 'sanctify' any of these herds with a special designation.

The agency is trying to use this to tie it to the Treasured Landscapes push-----and that takes us all down the trail of less commodity use and directly down the politically correct and smooth trail of ecotourism. There is already enough ecotourism in the American West without pretending that we need to introduce or enhance this industry to create economic solvency. Please do not insult us with such a pretext.

None of the animals warrant such an extra special designation.

Again---we do not support this exploitive concept. No further comment is necessary.

PLACE EXCESS ANIMALS INTO PRIVATE CARE

The goals, objectives and actions suggested here should already be, to a reasonable extent, part of the adoption program. There is nothing wrong with nurturing a love of these animals in young people. However, the proposed actions have that fairytale quality to them. There are no limitations carefully embedded into the actions which would appropriately develop a sense in young people that the 'sky is NOT the limit'. Agency actions should not be ignoring sound management concepts when communicating with your or old. There is a missed obligation here on the part of the BLM.

COMMUNICATIONS

Please refer to our Special Introductory Comments.

ANIMAL WELFARE

There is absolutely no need to create an Animal Welfare Program much less a Coordinator position. The BLM already knows how to handle and care for these animals and has the skills and experience to fine tune such efforts as needed.

The agency is again proposing to expand program responsibilities and costs. This section is FLUFF AND FILLER.

SCIENCE AND RESEARCH

Certainly the GOR support the continued application of science and research to improve WHB management.

Objective 2: Review and evaluate current.....

The BLM surely does not need to 'commission' the NAS and the NRC to review past reports and draw conclusions and make recommendations.

SUMMARY REMARKS

The Guardians of the Range acknowledge that a number of our remarks reflect serious frustration with some of the content of this draft document. The tone of frustration is not intended to offend, but they are intended to cut through much of the fog surrounding the public rhetoric relative to WHB management.

It is our contention that much of what is proposed in this document will exacerbate the management problems.

We also hold the view that unless the BLM provides the general public with a complete array of management considerations then no solutions will be found or supported. Conflict and chaos will continue, resulting in further degradation of resources under your stewardship.

The Guardians are more than willing to assist in helping to develop and deliver a more balanced message in communicating with the public on WHB management. **The solutions are in the messaging.**

Sincerely,

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