



For America's Heritage

Public Lands Foundation

P.O. Box 7226 Arlington, Virginia 22207

March 30, 2011

Via e-mail (wildhorse@blm.gov) and first class mail

Mr. Bob Abbey, Director
Bureau of Land Management
1849 C Street NW, Rm. 5665
Washington, D.C. 20240

Re: Comments on Wild Horse and Burro Program Proposed Strategy Document dated February 28, 2011

Dear Director Abbey,

The Public Lands Foundation (PLF) wishes to express its appreciation to you and your staff for your continuing efforts to seek solutions amidst the conflict and contentiousness that characterizes the wild horses and burros (WH&Bs) program.

The PLF is a national nonprofit, all volunteer membership, conservation organization dedicated to the ecological stability of the public lands administered by the Bureau of Land Management (BLM). It is made up of mostly former BLM employees with many years of experience in natural resource management.

Generally, we support the actions proposed in the February 28, 2011 Strategy; however, we take exception with some and believe greater emphasis needs to be placed on others. Detailed comments are included on the attached summary of BLM proposed actions.

We view the WH&Bs program as having two major components, each with its set of issues and challenges. The first component is management of WH&Bs on the range and the second is management of excess horses that have been gathered and removed from Herd Management Areas (HMAs).

With respect to managing WH&Bs on the range, we offer the following:

- We must disagree with a purposeful plan to reduce gathers, exceed AML and thus violate the 1971 Act.
- We support actions to reduce population growth on HMAs; however, would like to see indications that sex ratios will be adjusted beyond the 60:40 ratio currently employed during many gathers. So too, we would like to see consideration of temporarily creating non-reproducing herds where it is possible to achieve a 100% gather of relatively small herds. Actions such as these are essential in the face of shrinking budgets and seriously declining resource conditions.

- We support increased use of the fertility control drug PZP but are very concerned about its effectiveness, its cost and difficulty of dosing mares that are increasingly difficult to capture. PZP will not be a long-term solution to population management. We see no reason to wait for an NAS report on fertility control research. BLM should conduct its own program review calling upon experts to assist it in determining whether new and accelerated research may hold promise.
- We believe that major changes need to be made in the 1971 Act and in the way that wild horses and burros are maintained as an integral part of the public lands. The current system of managing WH&Bs on scattered HMAs of every size throughout the West is inefficient, dilutes management capability and hinders focus on WH&Bs and wildlife well being. Continuing to manage under this system is certain to perpetuate the never-ending conflict with livestock. The concept that we have advocated of establishing federally designated Ranges needs to be fully developed. Only then will it be possible to make an informed judgment if the promise it suggests for better management might be realized. We offer the assistance of the PLF to help develop this idea.

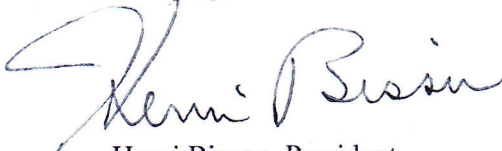
With respect to management of excess horses that have been gathered and removed from HMAs, we offer the following:

- Our principal concern is that several of the proposed actions seem to put the BLM at risk of diluting its overall program capability because of entering into too many small and inefficient arrangements for the care of excess horses. Economic analyses that take into account the cost of overhead and contract administration should be conducted before entering into any sanctuary or Farm Agency pasture agreements.

An overarching concern that we have with the strategy is that it does not suggest enough significant change in how WH&Bs are managed. Additionally, we are concerned that substantive decisions and actions will be deferred for two years waiting on the National Academy of Science (NAS) research report that will most likely provide little information not already available to the BLM.

We appreciate the opportunity to make our views known.

Sincerely,



Henri Bisson, President

Attachment: Public Lands Foundation Comments on Actions in BLM's Proposed Strategy for Future Management of America's Wild Horses and Burros, dated February 28, 2011