

July , 2010

To whom it may concern:

Following are my comments on the Department of Interior's "Wild Horse & Burro Strategy Development Document." As per the Bureau of Land Management's (BLM's) announcement on June 14, 2010 in Denver, Colorado, these comments are being submitted via the BLM's Washington office. The Denver meeting was touted as a means to open public dialogue on the BLM's management of the Wild Horse and Burro Program, yet since that meeting there has been no response to the overwhelming public opposition to the Bureau's actions. If the BLM is sincere in its desire to work with the public, a moratorium on roundups must be effectuated in order to develop a sustainable program that manages horses and burros on the range.

I am disappointed with the Obama Administration's policy of pursuing the same ill-conceived Bush-Administration policies that remove wild horses from our public lands at an unprecedented pace. Despite Interior Secretary Ken Salazar's admission that this policy is unsustainable, the Administration is in the process of removing 6,000 additional wild horses and burros before the end of October 2010. This Administration has conducted little to no management of wild horses and burros on the range and has consistently rounded up, removed and warehoused horses at the expense of taxpayers and wild horses. As a result, for the first time in history, there are more wild horses warehoused in government holding facilities than free on the range. Below are my comments on the Strategy Document.

TOPIC: Treasured Herds

- Every herd is treasured; I oppose how the BLM is interpreting the term because it involves manipulation and micromanagement. Congress already determined that every herd is treasured.

TOPIC: Preserves

- I urge an immediate moratorium on roundups to prevent creating need for more preserves.
- Preserves must not replace on-the-range management and should only be used to phase out long- and short-term holding.
- I support using the authority the BLM always had to re-establish horses in zeroed-out HAs and HMAs.
- I support commitment to not killing horses deemed "excess" and "unadoptable."
- Preserves should only be located in western states.
- Preserves must strive to maintain the social integrity of wild horse herds, allowing horses to live in more natural conditions instead of the current imposition of domestic conditions on horses who are still designated as "wild" under the law.
- Support private-public partnerships, but BLM must *immediately* pursue Soldier Meadows, Winecup Gamble, Madeleine Pickens and similar proposal now on the table to reduce long- and short-term holding.

TOPIC: Sustainable Herds

- The concept of sustainable herds is based on the arbitrary AML system which is based on unfair allocation practices and incomplete, faulty range data by BLM's own admission.
- I urge an *immediate* moratorium on roundups until a sustainable, solid plan is established.
- Only if proven necessary, I support fertility control with caveats.
- I oppose castration and spaying of horses and non-reproducing herds on the range.
- I oppose utilizing sex ratios to manage herds.
- I support increasing available forage through livestock allotment conversion to wild horses.

TOPIC: Adoptions

- I oppose reducing adoption requirements.
- Adoption programs should not be modified to accommodate financial incentives.
- I support exceptions can be made for international adoption only with bonafide humane association with authority to guarantee well being of horses.
- I oppose BLM's double standard of care requirements for adopters and short-term facilities.

TOPIC: Animal Welfare

- BLM must have complete transparency; I strongly object to the lack of transparency and support equal opportunity for all to participate - not only those invited by the BML, but for all public members to participate in internal BLM meetings, public observations and be given access to information.
- Interested members of the public must be allowed at *all* aspects of range monitoring, aerial counts, roundups and all holding facilities - must not be limited to specific individuals or organizations – must be representational and fair.

TOPIC: Science and Research

- Currently the BLM does not have the science or research needed to manage this program; BLM acknowledges it's lacking in this area.
- All gathering of information/data (i.e. census, etc) must be done with independent public observers or utilizing video technology to provide documentation to the public.
- A National Academy of Science (NAS) report must make a fresh and comprehensive review of the foundation of the BLM's program – beginning with the scientific/legal basis for the establishment of Appropriate Management Levels (AMLs), the utilization of on-the-range management options, the environmental assessment process, operations of BLM as a whole and by field office, etc.

This Strategy Document is based on a flawed foundation given that the Salazar initiative does not represent the fundamental reform that is needed. While I agree with portions of the initiative, it is premature to forward to Congress. Actions speak louder than words. BLM talks about change, but actions suggest business as usual:

- 6,000 horses scheduled for roundup and removal before the end of October. Deepening the fiscal black hole.
- Proposals on the table offering a new direction and cost-effective solutions. Bob Abbey invites proposals from the public then ignores them.
- National office talks reform; field offices continue business as usual policies.

I urge the BLM to immediately place a moratorium on roundups and schedule public hearings to create a program that protects and manages horses on the range, rather than warehousing them in government holding facilities.

Sincerely,

(first and last name)

(complete mailing address)