United States Department of the Interior
Bureau of Land Management

Scoping Report

Environmental Assessment

DOI-BLM-UT-W010-2017-0009-EA

June 2018

Onaqui Mountain Herd Management Area Population Control

Location: Townships 6-11 South, Ranges 5-9 West, multiple sections, Salt Lake Meridian, Tooele County, Utah.

Applicant/Address: Not Applicable.

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Salt Lake Field Office

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Scoping Report

In preparing the Onaqui Mountain Herd Management Area Population Control project environmental assessment (EA) (DOI-BLM-UT-W010-2017-0009-EA), the Bureau of Land Management (BLM) [Salt Lake Field Office (SLFO)] assembled a project mailing list and distributed an interested public letter (mailed 9/27/2018) introducing this project and announcing a 30-day public scoping period (10/2/2017-10/31/2017). This information was also provided on the project's webpage on the BLM's NEPA Register.[1] Refer to additional public outreach information in the EA at Sections 1.6 through 1.6.3 and 5.4 through 5.4.1.

The SLFO received approximately 6,003 comment letters [letters (12), faxes (4) or emails (5,986)] and one petition (with 7,798 names), from the public during the scoping period. Personal identifying information was protected on seven (7) individual comments. Most of the individual commenters were US citizens. The petition also included a number of individuals from other countries (such as Canada, Sweden, France, Germany, New Zealand, Japan or England). There were three (3) form letters submitted via email. In addition to these comments and the petition, approximately 355 emails were received after the scoping period closed. These late scoping comments followed the form letters previously submitted. There were many instances where individuals submitted comments multiple times using multiple methods, including the petition. The list of scoping period participants is included in Appendix A.

In general, the scoping comments addressed the use of the *Porcine zona pellucida* (PZP) vaccine/fertility control, reducing the number of horses removed if gathered, re-allocating AUMs to horses instead of livestock, creating a wild horse range, concern about recreation opportunities if fewer horses are on the range, and overlap of the horses and greater sage-grouse habitat. Most of the scoping comments expressed concerns/pleas and frustrations over how wild horses are managed by the BLM.

The research component of this EA has been removed. The details needed for research project are still in the development stage and are not ready for inclusion in this EA. This component may be started at a later time if/when a proposal has been prepared.

Public Scoping Comments

All public comments were reviewed by the SLFO. Comments were transcribed into the tabular form contained in Appendix B. Comments were reviewed for the identification of issues and alternatives. Similar comments were generally reviewed collectively. Appendix B is presented to show the range and detail of comments received. Because of the volume, original comments are available upon request for public review at the SLFO and will not be posted to the project's webpage on the NEPA Register. Except for the multiple variations of the form letters or those who were in general opposition to wild horse gather or maintenance activities, the content of these comments are transcribed in full in Appendix B.

As defined in the BLM NEPA Handbook (H-1790-1, page 40), "an 'issue' is a point of disagreement, debate, or dispute with a proposed action based on some anticipated environmental effect. An issue is more than just a position statement, such as disagreement with grazing on public lands. An issue:

[1] Project's NEPA Register website location: https://eplanning.blm.gov/epl-front-office/eplanning/projectSummary.do?methodName=renderDefaultProjectSummary&projectId=90785.

- Has a cause and effect relationship with the proposed action or alternatives;
- Is within the scope of the analysis;
- Has not been decided by law, regulation, or previous decision; and
- Is amenable to scientific analysis rather than conjecture."

Issues were sorted into two categories and each divided into topics:

- Analyzed in Detail (alternatives, mitigation/protective measures) (EA at Section 1.6.2 through 1.6.2.8).
- Not Analyzed in Detail [law, regulation, policy, previous decisions (planning or implementation level), outside the scope] (EA at Section 1.6.3).

Issues and Alternatives Analyzed in Detail

Based on scoping comments contained in Appendix B, public questions or concerns that were considered in detail included: wild horses (immuno-contraceptive vaccines, inventory, diet/overlap, gather methods/traps, holding facilities, transport, adoption preparation, released wild horses, and wild horse program activities after gather/trapping), recreation/social, soil/vegetation, wetlands/riparian zones/floodplains, and wildlife (migratory birds, greater sage-grouse, special status species, and general wildlife). Refer to the discussions contained in the EA at Section 1.6.2 and Sections 2.2 through and 2.4.

Issues and Alternatives Not Analyzed in Detail

Based on scoping comments contained in Appendix B, internal reviews and Cooperating Agency input, some of the public's questions or concerns, were considered but eliminated from detailed analysis for the reasons identified.

A. Issues

1. Policy/Funding/Education

Questions/issues on this topic were considered outside the scope of this EA. BLM has implemented a number of program specific measures to ensure the proper management of wild horses within the HMA. Section 1.5 of the EA, identifies policies, plans and standard operating procedures that are designed to implement the WHBA. These policies have been refined through seeking input from equine veterinarians, animal scientists, partners (including wild horse advocacy groups, State and County governments, other Federal agencies) and legal challenges. BLM employs specialists who are dedicated and specifically trained in implementing the WHBA and experts in equine management. Laws, regulations, policies (manuals, handbooks, IMs or IBs), RMP or previous decisions, and BLM funding for managing the wild horse program, including gathers and fertility control, is outside the scope of this EA.

Several of the questions or concerns identified in the scoping period, can be answered by reviewing the webpages provided here which show general and specific BLM policies towards a variety of wild horse program topics. The information contained within these webpages are incorporated and were used to sort through the public scoping comments to discern which can be answered through policy/positions statements versus those that were specific to the purpose/need for agency action now.

- General: https://www.blm.gov/programs/wild-horse-and-burro

- Myths and Facts: https://www.blm.gov/programs/wild-horse-and-burro/about-the-program/myths-and-facts
- Program Data: https://www.blm.gov/programs/wild-horse-and-burro/about-the-program/program-data
- Interactive Web Map: https://www.blm.gov/programs/wild-horse-and-burro/about-the-program/program-programs/interactive-web-maps
- Herd Management Areas: https://www.blm.gov/programs/wild-horse-and-burro/herd-management/herd-management-areas. Scroll to Utah's Onaqui Mountain HMA.
- Gathers and removals (will include 2018 schedule when it's finalized): https://www.blm.gov/programs/wild-horse-and-burro/herd-management/gathers-and-removals
- Adoption schedule: https://www.blm.gov/programs/wild-horse-and-burro/adoption-and-sales/adoption-events
- Advisory Board: https://www.blm.gov/programs/wild-horse-and-burro/get-involved/advisory-board

2. Land Tenure Adjustments

Questions/issues on this topic were considered outside the scope of this EA. Land tenure adjustments can be made throughout the life of a land use plan. AML updates due to any BLM land ownership change would be addressed after monitoring can be collected and completed to determine the permanent forage and water available from acreages lost or gained (H-4700-1). The BLM is currently considering a land exchange for certain parcels that intersect this HMA. This action has not yet been decided and a decision is not yet issued. Refer to the Skull Valley Land Exchange (DOI-BLM-UT-W010-2009-0026-EA).

3. Livestock Grazing

Questions/issues on this topic were considered outside the scope of this EA. Similar to wild horses, livestock grazing (including domestic horses) is part of the BLM's multiple use and sustained yield mandate under FLPMA. The area covered by the HMA/HA also includes eleven (11) established grazing allotments. Under a separate process, BLM continues to review and manage livestock grazing permits on a routine/rotating basis. Grazing permits on the Government Creek, West Lookout Pass and Indian Springs allotments, which intersect the Sheeprock Greater Sage-Grouse population area, are scheduled to begin the renewal process starting in fiscal year 2019. The renewal process will include a rangeland health assessment of these allotments, which will determine how the current grazing management is affecting the land health. If land health is shown to be in decline due to livestock grazing, appropriate corrective action will be analyzed in the permit renewal EA, and resulting decision, expected in fiscal year 2021. The remaining allotments within the HMA will follow this same process as planned in the current permit renewal schedule.

As per the grazing regulations 43 CFR §4130.3-3, the authorized officer may modify grazing permits when grazing does not meet management objectives or if it does not conform to rangeland health standards. The rangeland health assessments previously completed for some of these allotments (BLM 1999, BLM 2002) concluded that livestock grazing was not a causal factor for not meeting the rangeland health standards. Livestock grazing continues under the terms and conditions of the existing grazing permits. The respective allotments will be assessed

as per an approved/revised permit renewal schedule consistent with current policies (such as instruction memorandum). During the livestock grazing permit renewal process, the BLM will address the management of the grazing allotments, which may include suspended AUMs (including any possible reinstatement), the frequency of voluntary/required reductions in annual grazing use (as applicable), and forage allocations for livestock, wild horses, wildlife and watershed requirements.

Grazing allotment infrastructure and management practices can include salt/mineral blocks, fencing, gates, corrals, cattle guards, trails and water developments (pipelines, wells, tanks, and troughs). This infrastructure is authorized under the supporting program regulations (such as livestock grazing or rights-of-ways). Water use remains as authorized by Utah's Water Rights Law, Title 73, as administered by the Utah Division of Water Rights.

Livestock grazing within the HMA and the Sheeprock Greater Sage-Grouse Unit is subject to the Pony Express RMP as amended by the 2015 ROD ARMPA. BLM explains its decision in the management of greater sage-grouse habitat when triggers are met. As previously stated, BLM will be addressing livestock grazing management actions beginning in 2019. The BLM is currently collecting data that will be used in completing the Habitat Assessment Framework (HAF). Conclusions of the HAF will be used to inform the permit renewal environmental review process.

As stated by PLPCO (2018), the combined eight allotments produce 19,235 AUMs under their current permits, which could provide roughly $1.9 million in benefits to local economies.[2] However, overpopulated herds of wild horses are consuming an estimated 5,685 AUMs more than the amount of feed that they would be if populations were at AML. Consequently, the overpopulation of wild horses is harming the agricultural industry in the area by at least $568,500 annually. The livestock industry in Tooele County has grown since 1970 from a $19 million industry to a $35 million industry. Addressing the overpopulation of wild horses would help to increase the economic benefits that agriculture contributes to the economy and create agricultural jobs in the county.

4. Wildfire Stabilization and Rehabilitation Plans/Fuels and Vegetation Management Goals

Questions/issues on this topic, including associated costs to implement approved plans were considered outside the scope of this EA. Wildfire management is also a component of the BLM's multiple use and sustained yield mandate under FLPMA. Wildfire management addresses many things including fire suppression and incident business efforts as well as prevention, mitigation, and education.

The West Deseret District Office's wildfire management goals and objectives are established the fire management plan. After an incident occurs, a Wildfire Stabilization and Rehabilitation Plan (ESR) is prepared and approved when warranted.

In the summer of 2017, the Onaqui Complex wildfires occurred in and around the Sheeprock Mountains. As part of the BLM's wildfire management process, the Onaqui Complex Emergency Stabilization and Burned Area Rehabilitation Plan was prepared and approved in August 2017. This plan describes in detail what treatments will be done to improve the habitat that was burned during the summer of 2017. Part of this treatment plan includes installing fences

[2] PLPCO (2018), estimates the value of an AUM is $100 annually.

around areas that are planned to be treated/seeded in the fall of 2018. On 3/9/2017, all wild horses were removed from the fenced area. The fencing will be removed upon successful reseeding and establishment of the plants.

The cost of rehabilitating rangelands that have seen negative impacts from improper grazing by wild horses. At an average cost of $200.00-$300.00 per acre for vegetation projects, the 100's of thousands of acres that have been negatively affected by improper grazing by wild horses cost to the BLM, the State of Utah, livestock producers, sportsmen, and other groups that work cooperatively to maintain healthy rangelands (PLPCO 2018).[3]

BLM continues to develop/implement vegetation management projects with multiple partners that address fuel loads (including cheatgrass), wildlife habitats, and rangeland health. BLM participates in statewide efforts with a variety landowners and governments in forward looking programs (such as the WRI) that benefit share resources/common goals.

5. Pleas/Frustrations/Quotes

Questions/issues on this topic were considered outside the scope of this EA. BLM recognizes the personal values attributed to wild horses, including those within the Onaqui Mountain HMA. Furthermore, the BLM acknowledges the frustrations and concerns expressed by the public regarding this project. Information within the comments that were expressions of frustration, position, or opinion are acknowledged, but did not assist in the preparation of issues or alternatives to be considered in this EA. Responses to or clarifications made to the EA from these items are not necessary.

B. Alternatives

As identified in the EA at Section 2.5, the BLM considered but eliminated the following sixteen (16) alternatives from detailed analysis for the following reasons:

1. No Gathers or Maintenance Activities within the HMA

With this alternative there would not be any gathers and we would not apply immuno-contraceptive treatments to any of the mares within the HMA. Since there is already a fertility control program currently in place this option was not analyzed in further detail. This option also does not meet the purpose and need of the BLM which is to maintain wild horses within AML in the HMA.

This alternative was run through the WinEquus program, and is detailed in Appendix C of the EA. The modeling showed that the population growth rate was between 11.2% to 22.1% with the average being 16.9%. Also in the 100 trials run the lowest number of wild horses was 429 and the highest was 4407 the average ranged from 730 to 1870.

2 Adjustments to HMA or HA Boundaries

As per the BLM's Land Use Planning Handbook (H-1601-1, Appendix C, Page 7), HMAs and HAs are limited to areas of the public lands as being habitat for wild horses at the time of the passage of the WHBA. An HA can only be changed if it is only being used by privately owned animals (wild horses/burros) or if it does not correctly portray were the animals were found in

[3] PLPCO. 2018. Onaqui Mountain Herd Management Area Population Control and Research Project Environmental Assessment–Cooperating Agency Review. Letter from Director Clarke to Acting Field Manager Wood. Dated 6/1/2018. As supplemented. 6 pages.

1971. BLM considered this information in preparing the 2003 DR issued for the Wild Horse Appropriate Management Level and Herd Management Area/Herd Boundary (UT-020-2002-100). BLM is not considering land use plan-level decisions at this time and therefore is alterative is outside the scope of this EA. BLM will consider adjustments to the HMA/HA boundaries when a plan revision or plan amendment is proposed in the future.

3 Relocate Bands to New Locations

Similar to the Adjustments to the HMA or HA Boundaries alternative, BLM reviewed and established the both boundaries in 2003. Relocating bands to areas outside of the HA would not be consistent with the WHBA or Bureau policy. Relocating wild horses within the HMA is not viable because of the transitory nature of the individuals and their bands. Horse may return to locations within the HMA/HA. Wild horses that are outside of the HMA/HA would be removed if the Proposed Action or GonaCon™ Contraception Treatments alternatives were selected.

4 Adjustments to AML Numbers

As per the BLM's Land Use Planning Handbook (H-1601-1, Appendix C, Page 8), AMLs are implementation-level decisions established based on monitoring and evaluations. BLM thoroughly considered and established the AML, including the population range in preparing the 2003 DR issued for the Wild Horse Appropriate Management Level and Herd Management Area/Herd Boundary (UT-020-2002-100). This DR set the Onaqui Mountain HMA AML at 159 animals within the range of 121 to 210 wild horses.

5 Reductions/Closures in Livestock Grazing

The livestock forage allocations (AUMs), including type of and number of livestock, remain as established in the ROD for the Pony Express RMP. BLM is not considering land use plan-level decisions at this time and; therefore, this alterative is outside the scope of this EA. (Refer to A Issues, #3 Livestock Grazing).

6 Increase PZP Treatments

In accordance with the 2015 DR issued for the Onaqui Mountain Herd Management Area Fertility Control EA (UT-W010-2014-0021-EA), the PZP treatment program for this herd consists of:

PZP will be administered in the one year liquid doses and [will start in 2015 and] go through 2020. If monitoring shows successful applications, no negative reactions and reduction in foaling rates, the fertility control treatments would continue beyond 2020 as long as it can be reasonably concluded that no new information and no new circumstances arise that need to be considered and those that are analyzed within EA DOI-BLM-UT-W010-2014-0021-EA have not substantially changed within the HMA. Fertility control applications will also depend on annual funding and the presence of qualified applicators.

BLM's PZP treatment history and effectiveness is presented in Section 3.3.1. PZP treatments remains as a management priority for the herd and as a major component of the Proposed Action. This alternative is redundant and is essentially common to all alternatives.

7 Designate a National Wild Horse Range

As per the BLM's Land Use Planning Handbook (H-1601-1, Appendix C, Page 7), an HMA may be considered for designation as a wild horse and burro range when there is public value present, such as unique characteristics in a herd or an outstanding opportunity for public viewing. BLM is not considering a land use plan-level decision at this time and; therefore, this alterative is outside the scope of this EA. BLM will consider this designation when a plan revision or plan amendment is proposed in the future.

8 Promote Equine Therapy Program

BLM will continue to work with local or national partners in promoting programs that utilize and promote the adoption and/or sale of wild horses.[4] Developing a therapy program with the DOD for veterans and their families here in northern Utah or nationally could lead to rewards for all participants.

Wild horses that are removed from within or outside of the HA/HMA do have better opportunity to be adopted by organizations or groups that promote therapy programs. BLM does not have a therapy program at this time and would consider partnerships with organization(s) if it were proposed with full details for administering and funding a therapy program. While this effort is recognized as important and necessary for some military families, it does not address the purpose and need for agency action.

9 Research Program

With the management priority for the greater sage-grouse in the Western United States, the BLM and its partners including Brigham Young University remain interested in establishing research that explores the interaction among the wild horses, greater sage-grouse, vegetation treatments, and fertility control or other methods to maintain herd numbers. However, the details of a research proposal are not fully vetted at this time. Other research related proposals could be considered in the future.

10 Use of Bait and/or Water Trapping Only

An alternative considered but eliminated from detailed analysis was use of bait and/or water trapping as the sole gathering method. The use of bait and water trapping, though effective in specific areas and circumstances, would not be timely, cost-effective or practical as the sole gather method for this HMA. However, water or bait trapping may be used as a supplementary approach to achieve the desired goals if gather efficiencies are too low using a helicopter if a helicopter gather cannot be timely scheduled, or for maintenance gathers. This alternative was dismissed from detailed study as a primary or sole gather method for the following reasons:

1. The HMA is too large to effectively use this gather method as the primary or sole method;
2. Road access for vehicles to potential trapping locations necessary to get equipment in/out as well as safely transport gathered wild horses is limited; and
3. The large numbers of wild horses proposed to be gathered would make water or bait trapping as a sole capture method impossible within a reasonable time frame.

[4] Additional information on BLM's partnerships can be accessed online at: https://www.blm.gov/programs/wild-horse-and-burro/partnerships.

11 Gathering at the High End AML

Gathering wild horses to achieve a post-gather population size at the upper level of the AML range would result in AML being exceeded with the next foaling season. This would be problematic for several reasons.

The upper levels of the AML range established for a HMA represent the maximum population for which a thriving natural ecological balance can be maintained. The lower range represents the number of animals that should remain in the HMA following a wild horse gather in order to allow for a periodic gather cycle of approximately every four years and to prevent the population from exceeding the established AML between gathers. The need to gather below the upper range of AML has been recognized by the IBLA, which has held that:

. . . the term AML within the context of the statute to mean[s] that "optimum number" of wild horses which results in a thriving natural eco- logical balance and avoids a deterioration of the range (Animal Protection Institute of America v. Nevada BLM. 1989b).

Proper range management dictates removal of wild horses before the herd size causes damage to the range land. Thus, the optimum number of wild horses is somewhere below the number that would cause damage. Removal of wild horses before range conditions deteriorate ensures that wild horses enjoy adequate forage and an ecological balance is maintained (Animal Protection Institute of America *et al.* v. Rock Springs District BLM 1991).

Additionally, gathering to the upper range of AML would result in the need to follow up with another gather within one year, and could result in over utilization of vegetation resources, damage to the rangeland, and increased stress to wild horses. For these reasons, this alternative did not receive further consideration in this document.

12 Control of Wild Horse Numbers by Natural Means

This alternative would use natural means, such as natural predation and weather, to control the wild horse population. This alternative was eliminated from further consideration because it would be contrary to the WFRHBA which requires the BLM to protect the range from deterioration associated with an overpopulation of wild horses. The alternative of using natural controls to achieve a desirable AML has not been shown to be feasible in the past. Wild horse populations in the HMA are not substantially regulated by predators, as evidenced by the 15-25% annual increase in the wild horse populations. In addition, wild horses are a long-lived species with documented foal survival rates exceeding 95% and are not a self-regulating species. This alternative would allow for a steady increase in the wild horse populations which would continue to exceed the carrying capacity of the range and would cause increasing damage to the rangelands until severe range degradation or natural conditions that occur periodically – such as blizzards or extreme drought – cause a catastrophic mortality of wild horses in the HMA.

13 Make Individualized Excess Wild Horse Determinations Prior to Removal

An alternative whereby BLM would make on-the-ground and individualized excess wild horse determinations prior to removal of wild horses from any HMA has been advocated by some members of the public. Under the view set forth in some comments during public commenting for wild horse gathers nationwide, a tiered or phased removal of wild horses from the range is mandated by the WFRHBA. Specifically, this alternative would involve a tiered gather approach, whereby BLM would first identify and remove old, sick or lame animals in order to euthanize those animals on the range prior to gather. Second, BLM would identify and remove wild horses

for which adoption demand exists, e.g., younger wild horses or wild horses with unusual and interesting markings. Under the WFRHBA [1333(b)(2)(iv)(C)], BLM would then sell or destroy any additional excess wild horses for which adoption demand does not exist in the most humane and cost effective manner possible, although euthanasia and sale without limitations are currently limited by Congressional appropriations.

This proposed alternative could be viable in situations where the HMA is contained, the area is readily accessible and wild horses are clearly visible, and where the number of wild horses to be removed is so small that a targeted approach to removal can be implemented. However, under the conditions present within the gather area, and the large number of excess wild horses both inside and outside of the HMA, this proposed alternative is impractical, if not impossible, as well as less humane for a variety of reasons.

First, BLM does euthanize old, sick or lame animals on the range when such animals have been identified. This occurs on an on-going basis and is not limited to wild horse gathers. During a gather, if old, sick or lame animals are found and it is clear that an animal's condition requires the animal to be put down, that animal is separated from the rest of the group that is being herded so that it can be euthanized on the range. However, wild horses that meet the criteria for humane destruction because they are old, sick or lame usually cannot be identified as such until they have been gathered and examined up close, e.g., so as to determine whether the wild horses have lost all their teeth or are club footed. Old, sick and lame wild horses meeting the criteria for humane euthanasia are also only a small fraction of the total number of wild horses to be gathered, comprising on average about 0.5% of gathered wild horses. Thus, in a gather of over 1,000 wild horses, potentially about five of the gathered wild horses might meet the criteria for humane destruction over an area of over three quarters of a million acres.

Due to the size of the gather area, access limitations associated with topographic and terrain features and the challenges of approaching wild horses close enough to make an individualized determination of whether a wild horse is old, sick or lame, it would be virtually impossible to conduct a phased culling of such wild horses on the range without actually gathering and examining the wild horses. Similarly, rounding up and removing wild horses for which an adoption demand exists, before gathering any other excess wild horses, would be both impractical and much more disruptive and traumatic for the animals. Recent gathers have had success in adopting out approximately 30% of excess wild horses removed from the range on an annual basis. The size of the gather area, terrain challenges, difficulties of approaching the wild horses close enough to determine age and whether they have characteristics (such as color or markings) that make them more adoptable, the impracticalities inherent in attempting to separate the small number of adoptable wild horses from the rest of the herd, and the impacts to the wild horses from the closer contact necessary, makes such phased removal a much less desirable method for gathering excess wild horses. This approach would create a higher level of disruption for the wild horses on the range and would also make it much more difficult to gather the remaining excess wild horses.

Furthermore, if BLM plans to apply any population controls to gathered wild horses prior to release, it would be necessary to gather more than just the excess wild horses to be removed, making this type of phased approach completely unnecessary and counter-productive.

Making a determination of excess as to a specific wild horse under this alternative, and then successfully gathering that individual wild horse would be impractical to implement (if not impossible) due to the size of the gather area, terrain challenges and difficulties approaching the wild horses close enough to make an individualized determination. This tiered approach would also be extremely disruptive to the wild horses due to repeated culling and gather activities over a short period of time. Gathering excess wild horses under this alternative would greatly increase the potential stress placed on the animals due to repeated attempts to capture specific animals and not others in the band. This in turn would increase the potential for injury, separation of mare/foal pairs, and possible mortality.

This alternative would be impractical to implement (if not impossible), would be cost-prohibitive, and would be unlikely to result in the successful removal of excess wild horses or application of population controls to released wild horses. This approach would also be less humane and more disruptive and traumatic for the wild horses. This alternative was therefore eliminated from any further consideration.

14 Use of Alternative Capture Techniques Instead of Helicopter Capture

An alternative using capture methods other than helicopters to gather excess wild horses has been suggested by some members of the public. As no specific alternative methods were suggested, the BLM identified chemical immobilization, net gunning, and wrangler/horseback drive trapping as potential methods for gathering wild horses. Net gunning techniques normally used to capture big game animals also rely on helicopters. Chemical immobilization is a very specialized technique and strictly regulated. Currently the BLM does not have sufficient expertise to implement either of these methods and it would be impractical to use given the size of the HMA, access limitations, and difficulties in approachability of the wild horses.

Use of wrangler on horseback drive-trapping to remove excess wild horses can be fairly effective on a small scale. However, given the number of excess wild horses to be removed, the large geographic size of the HMA gather area, access limitations, and difficulties in approaching the wild horses this technique would be ineffective and impractical. Horseback drive-trapping is also very labor intensive and can be very dangerous to the domestic horses and the wranglers used to herd the wild horses. Domestic horses can easily be injured while covering rough terrain and the wrangler could be injured if he/she falls off. For these reasons, this alternative was eliminated from further consideration.

15 Use of Geldings as Non-Reproductive Population

Under this alternative, a portion of the wild horses released would be a non-reproductive population of geldings. This was excluded from further consideration due to an AML of 121-210 wild horses. This AML goal would not allow enough geldings to be released back into the HMA to have any influence or contribute to a substantial reduction to the reproduction rate of the herd; bracketed by the need to maintain a required or necessary level of breeding wild horses within the HMA. Utilizing geldings as a population management tool would be more effective on HMAs with larger AMLs.

16 Fencing to Exclude Wild Horses from Greater Sage-Grouse Habitat

Under this alternative, fences would be constructed to exclude wild horses from greater sage-grouse habitat. Approximately 123,904 acres of greater sage-grouse habitat occurs within the HMA (60% of the 205,394 acre HMA). This is a large area of land that would be unavailable to wild horses on a permanent basis should fence(s) be constructed. This acreage reduction would cause a permanent AML reduction. A reduction in the AML must be re-evaluated and a determination made as to the minimum of wild horses necessary to maintain a viable Onaqui Mountain herd/population. Proper design and layout for fencing has not been determined. Additional details would be required before an analysis could be made by the BLM. Alone, this alternative does not allow for effective management and implementation of Utah BLM's Information Bulletin 2017-010. A reduction in the AML or HMA boundary is out of scope of this EA. Refer also to the rationale provided for Alternatives 2 and 4.

Appendix A, Scoping Period Participants

Number	Individual/Group/Organization/Agency
Letters	
1	Jim Schnepel (Wild Horses of America Foundation) (Same as #26)
2	Ann Nguyen
3	Debra Hunt
4	Charleen Slinkerd
5	Annie Malone
6	Dorothy Morris
7	Casey Gent
8	Lynne Pomeranz (Same as #35)
9	Ellen Hendrickson
10	Dave Fackrell
11	Maria Ciampa
12	Marion Fliehr
Petition	
13	Jim Schnepel (Wild Horses of America Foundation) (Same as #19)
Faxes	
14	Sherry Oster
15	Katie (surname not provided)
16	Diane Levasseur
17	Eileen Hennessy
Email/Groups	
18	Suzanne Roy (Wild Horses of America Foundation and American Wild Horse Campaign)
19	Jim Schnepel (Wild Horses of America Foundation) (Same as #13)
20	Jennifer Best (Friends of Animals)
21	Erik Molvar (Western Watersheds Project)
22	Laura Leigh (Wild Horse Education)
23	Cory Golden (Return to Freedom Wild Horse Conservation)
24	Kathleen Clarke (Public Lands Policy Coordinating Office)
25	Ginger Kathrens (The Cloud Foundation)
26	Jim Schnepel (Wild Horses of America Foundation) (Same as #1)
27	Craig Downer (Wild Horse and Burro Fund)
Emails – Personal Identification Information (PII) Protection Request	
28	Protected
29	Protected
30	Protected

Number	Individual/Group/Organization/Agency
31	Protected
32	Protected
33	Protected
34	Protected
Email/General-Unique-Detailed	
35	Launi B Photography (Same as #8)
36	Janet Lynch
37	Marissa Carter
38	Eileen Hennessy
39	Dusty Miller
40	Karin Kruse
41	Angela Murdock
42	Carol Withers
43	Lindsay Mann
44	Debra L Hunt
45	Kathleen Hayden
46	Cheryl Bowe
47	Lorna Moffat
48	Janice Flatto
49	Lynne Pomeranz Roberts (Same as #8)
50	TJ Holmes
51	Lisa Anne Friday
52	Robert Hammer
53	Frank J Walker
54	Bob Weston
55	Stacey Petersen
56	Anthony Rutledge
57	Rex Stanworth
58	Dave Fackrell
Emails - Form Letters	
59	American Wild Horse Campaign
60	Wild Horses of America Foundation
61	Unknown Origin (possible variations/combinations of #59 or #60).
62	Multiple Individuals (approximately 5,942; some covered by previous submissions).

Appendix B, Scoping Comments

Number	Alternative Driving	Issues or Concerns	Scoping Comment
1	--	--	Same as 26.
2	No	Policy / Wild Horses / Greater Sage Grouse	I have observed and photograph Onaqui Mountain Wild Horse and other herds in Montana and Wyoming. My Recommendations as follows: Do not permanently remove 325 horses (72%) as they might be killed in holding, per the most recent recommendation of the BLM National Advisory Board. Removing these horses will render the herd genetically non-viable per equine geneticist, Dr. Gus Cothran. He advises at least 150-200 horses must remain in the herd to ensure genetic viability. The BLM cites the preservation of sage grouse territory as a reason for removing these horses. Yet, there are only a few places where wild horses and sage grouse live together in the HMA. In those places fencing can mitigate the potential harm to sage grouse in lieu of permanent removal. The U.S. Fish & Wildlife Service released a study in 2012 that did not cite wild horses as one of the top five threats to sage grouse. Instead, it cites energy development, transmission right of ways, fire, invasive species, and commercial development as the top threats. BLM must focus on fertility control. Their plan to treat 60 mares in FY2018 is not adequate to slow reproduction. Volunteers with the Wild Horses of America Foundation are ready and able to implement a larger population control program.
3	Yes	Policy / Wild Horses / Photography / Recreation / Livestock / ESR / Frustration	I have been informed of the proposed roundup and removal of wild horses in the Onaqui Herd Management Area. Would you please accept the following comments on the BLM Scoping Notice for the proposed roundup and removal of wild horses in the Onaqui Herd Management Area (HMA). Thank you. As you know, the Onaqui HMA is one of a few HMAs within proximity to a large city. This fact makes them more accessible for the public to view, photograph and enjoy. This herd is a unique wild horse population. They are beloved by visitors who travel to this area solely to observe and enjoy these horses who have been an important part of the Utah's landscape and history. If you were to do a search on Facebook for the number of photos you might see from this HMA you might be surprised. I have a number of facebook friends that love to photograph in this HMA. Thus, the proposal to remove the vast majority of the Onaqui horses will have a very negative and harmful impact on the human enjoyment and the recreational use of these public lands. The Public Lands of America were introduced as a means of recreation for the Public, and later have become a means of profit for government and non-government entities. But the BLM should never forget the priority of these lands ... human enjoyment and recreational use over private business profits. I make this statement because the "Multi-Use Management" for our Public Lands is destroying our lands, cutting off areas from public use and destroying the wildlife that call those lands home. This includes wild horses and burros. I do understand that the Sage Grouse make their home in this HMA also. But I do believe that cattle are allowed to graze in this area too. Cattle destroy our public lands, decimate vegetation and destroy wildlife areas. Cattle are not wildlife; only a domestic non wildlife species and are only introduced on Public Lands for the profit and gain of private business entities. Neither the cattle or the private business entities provide any value for public viewing and enjoyment. Most of the Public would agree that cattle should not be given priority over our wild horses (i.e., wildlife) and they do not enjoy seeing them roam on our Public Lands. In regard to the BLM Environmental Assessment, please consider the following: 1. Manage the wild horses for public viewing, photography and enjoyment. 2. Manage the wild horses as an important part of Utah's landscape and history. 3. Manage the wild horses as wildlife, and give them priority over other "Multi-Use" entities including "For Profit" businesses both government and nongovernment related. 4. Manage the wild horses with fertility control, not removals. This would be in accordance with the recommendations of the National Academy of Sciences (NAS) in its 2013 report, "Using Science to Improve the BLM Wild Horse and Burro Program: A Way Forward." Immediately vaccinate a sufficient number of mares yearly to attain zero population growth in the shortest amount of time. Least intrusive methods for application of PZP fertility control should be used, including remote darting and/or bait and water trapping. 5. Increase the allowable number of horses (AML) in this HMA to, at minimum, accommodate the current population level, making forage adjustments, if necessary, pursuant to CFR 43 C.F.R. 4710.S(a) to ensure that wild horses are given equitable usage of our public lands. 6. Restore Herd Area territory to active management status (i.e., increasing the size of the Onaqui HMA to the 507,681 acres which was originally designated by Congress, but was not followed through by our government). 7. Designate the Onaqui HMA as a National Wild Horse Range due to its proximity to Salt Lake City, the accessibility of the Onaqui herds for photographing and wild horse viewing, the popularity of this herd with visitors and tourists and the economic benefits of the Onaqui horses to the local area. This would be a successful designation for the wild horses, for Americans, for the Tourist, and for the economic growth of the area. 8. Temporarily fence off burn area to allow regeneration without removal of wild horses. Wild horses are wildlife and if you are not removing other wildlife from the area, the wild horses should not be removed either. 9. However, if any removals are deemed necessary after the above, they must be small in numbers, incremental and limited to horses who can either be adopted or placed in sanctuaries. Watching the BLM Management of our Wild Horses has been a sad state of affairs for me personally. Our wild horses have been scape-goated for land degradation when you can see that the cattle far outnumber the wild horses on the same lands. In Checkerboard areas, the cattle ranchers have pushed and pushed to remove wild horses and burros because they understand that America's Public Lands are valuable for their own use. Oil, Gas and Mining have become profitable for both our government and for business entities, and our Public Lands provide vast amounts to land for just that. Our Public Lands have become a veritable "Gold Mine" for profiteers. Also, I view our wild horses and burros as "wildlife", but the BLM does not as shown by the roundups and removals (i.e., does the BLM roundup and remove deer, elk, wolves, sage grouse???). The NAS report contracted by the Interior was a science based set of tools, but has been thoroughly ignored by the BLM and both Secretary of Interiors since it came out. Now our government wants to destroy our wild horses because of the non-science based management methods that have been deployed by the themselves. There are better ways, but our government has refused to listen to the real public ... those that hold our lands and our wildlife dear because of their real love of wildlife and beauty of our lands. However, it is my hope that because this HMA is very unique and loved by the Public, you will change your Environmental Assessment to include other factors that give our wildlife a fighting chance on our Public Lands for both the good of the Public AND for the wildlife that they are. Thank you for the opportunity to comment.
4	No	Fristration / Livestock / Wild Horses / ESR	I understand round ups. I have been living here 20 years and watch many of the wild horses and watched rounds ups. At this time we have problems. This is due to lack of BLM and its controlled numbers on the horses. Also the weather. Also the rangers. More cows are being moved onto the BLM lands in the past five years. Cows are eating up and drinking more. The weather is playing a big part of making the horses come on BLM land and BLM have not controlled the numbers in the past 5 years. that said. The wild horses in Nevada and Dugway, The Onaqui Herd are not that large. 10 years ago we had 600. In the last two years we have lost the babies due to cold, and disformed. BLM has put them down. In the past two years I have only seen 200 on the Dugway side and Simpsons Springs. Yes theres more but Are they a problem. They have lost 3 stallions due to old age. This herd is very healthy very good legs, huffs, no infections, etc. Not like what is going on with the horses down south, Milford/Beaver. I hear all the rangers (Cousins) want to delete the herd or herds. So they can keep there cows out in the summer and not have to feed them. This is very upsetting to me because I drive back and forth south and find a large number of cows dead on the side of the road, or standing or walking on the side of the road. Why. To many cows and no grass. Its drying up due to weather and their looking for food near the roads. so taking and killing the horses in the area is not the right. No fair to the wild horse that has all the rights to be there. My voice is one. I learned about the horses when I learned about the round ups 20 years ago. BLM has given water and control for 100s of years. But to kill off or sell our history of the wild is not right. If you have done this every two years and take the younger ones and fix some mares, or stallions we can control these horses.Another point. Man wants a horse that is tall, strong, and best in show. We have over stepped the look of a good horses. There are more problems with show horses and back yard horses then the wild horses. the huffs are broken down, you can't ride them. So everyone go to a breeder for another. These horses are not for looks they are the American Horse. Wild and Free. BLM has now become a bad name because the lack of control in the past and now have to control the numbers of the horses due to cows and their land. One day cows will be only feed in fence areas. Are there numbers going to be controlled. I am a farmer too. But I see what has been done and not done. The cows are in know and get feed every day. Theses horses are still eating and looking for water. Yes numbers will clime but that's the wild side of it. We have not had any problems with this herd. This herd has taking care of its self. Death and new born and their health is just fine.I only see doing a round up for the cows numbers and they need the land to feed more numbers. WE SEE THAT THE FEILDES WERE BURNED AND NOW HE RESEEDING IS TAKING PLACE OUT NEAR DUGWAY. ITS FOR THE COWS. OK. Man has made that move to improve the land for cows. A wild horse will take notice. I am not a fan of this round up and the number you are taking. Have you ever seen a horse out there that is sick. NO. I understand BLM is to only take the sick or the old. SO how many are sick? and how many are old? Not even close to your numbers. I can go on and on. Utah is one place were a wild horse should be allowed to be free. BLM needs to be correct and show America we can control the numbers by safe rules and handling the wild horses every two years. NOT like what you plan to do now.
5	No	Policy / Greater Sage-Grouse / Wild Horses	I am very concerned about the proposed removal of 325 horses from the Onaqui Herd Management Area in Utah. This would decimate the population of these horses that are very popular with the public. Since citizens pay for the care and management of these lands, it is only fair that they determine policy. I do not want my tax dollars being used to subsidize ranchers, oil and mineral interests or to round up wild horses. The BLM claims that the horses should be removed to protect the sage grouse. However, the U.S. Fish and Wildlife Service report of 2012 identified energy development, transmission of right of ways, fire and invasive species as major threats. Fencing would be a much cheaper solution than the costly roundups. Since volunteers from the Wild Horses of America Foundation are prepared to implement a large population control program, it is unclear to me why my tax dollars should be spent on this roundup. I would like more public accountability from the BLM. Taxpayers' have demonstrated a desire to have wild horses on our lands. I would like our voices to be heard and respected.
6	Yes	Recreation / Wild Horses / ESR	Please accept the following comments on the BLM Scoping Notice for the proposed roundup and removal of wild horses in the Onaqui Herd Management Area (HMA). The Onaqui HMA is one of a few HMAs within proximity to a large city which makes them more accessible for the public to enjoy. This herd is a unique wild horse population that is beloved by visitors who travel to this area solely to observe and enjoy these horses who have been an important part of the Utah's landscape and history. The proposal to remove the vast majority of the Onaqui horses will negatively impact the human enjoyment and recreational use of these public lands. ALTERNATIVES THAT MUST BE CONSIDERED IN THE ENVIRONMENTAL ASSESSMENT: 1. Manage the population with fertility control, not removals in accordance with the recommendations of the National Academy of Sciences (NAS) in its 2013 report, "Using Science to Improve the BLM Wild Horse and Burro Program: A Way Forward. Immediately vaccinate a sufficient number of mares yearly to attain zero population growth in the shortest amount of time. Least intrusive methods for application of PZP fertility control should be used, including remote darting and/or bait and water trapping; 2. Increase the allowable number of horses (AML) in this HMA to, at minimum, accommodate the current population level, making forage adjustments, if necessary, pursuant to CFR 43 C.F.R. 4710.5(a) to ensure that wild horses are given equitable usage of our public lands; 3. Restore Herd Area territory to active management status, thereby increasing the size of the Onaqui HMA to the 507,681 acres originally designated by Congress; 4. Designate the Onaqui HMA as a National Wild Horse Range due to its proximity to Salt Lake City, the accessibility of the Onaqui herds for photographing and wild horse viewing, the popularity of this herd with visitors and tourists and the economic benefits of the Onaqui horses to the local area; 5. Temporarily fence off burn area to allow regeneration without removal of wild horses; and 6. lf any removals do take place, they must be small in numbers, incremental and limited to horses who can either be adopted or placed in sanctuaries. I believer that any United States who pays income taxes has an ownership stake in America's wild horses. I respectfully ask that you consider my requests for a more humane and responsible method of managing the horses.
7	No	Recreation / Photography / Wild Horses	How often have you passed a meadow or farm where horses are huddled together or nuzzling nose to nose? I see horses diplaying this type of affection toward one another often, because they are social and herd animals. Today I am writing to you to ask that you not round up or destory up to 300 members. Of the Onaqui mountain horse herd. This herd exists as a family, and i do not want to see the herd radically lessened in number. As a professional photographer, i spend a certain percentage of my income traveling to photograph the Onaqui herd. Instead of rounding·up vast numbers of this special wild herd, please consider increasing the doses of PZP to manage growth. The Onaqui mountain herd is symbolic of the American west. If you lessen the herd's numbers too radically, genetic imperfetions may become a real concern. Please protect these wild horses. Thank you!

8	Yes	Photograph / Wild Horses	Thank you for the opportunity to comment on the proposed gather and removal of 325 horses from the Onaqui Mountain HMA. I also want to thank all of you at the BLM who have taken the time to return my calls and answer my questions, and for what I have perceived from some of you to be a true caring about these horses. For the past five years I have been photographing this herd and have had a BLM permit for four years to lead wild horse photography workshops on this horse range. I must tell you that it has become my favorite wild horse range in the country. The Onaqui horses are amazing. I believe it is a combination of the incredible diversity of color in the herd, fine conformation, superior condition/health, beauty of the landscape they live in, and accessibility to them that has made them one of the most popular herds in the country. The American public loves this herd. The Onaqui horses are a huge draw for attracting tourists and photographers to visit and patronize Tooele County, which has to mean an increase in revenue for the county and surrounding areas. In the years I have been visiting and leading workshops, on the horse range I have seen a large increase in the number of vehicles (including ATVs) stopped to view the horses, a growing number of photographers, both amateur and professional, and countless numbers of photographs of the herd on social media by people from all over the country. They have immense recreational value on our public lands. Without meaning to belittle the sage grouse or the livelihood of ranchers, I believe I can fairly say that this sector of the public is coming to visit the area to view horses, not sage grouse and livestock. The public is fascinated by this Utah herd. I wish you could see the faces of my workshop clients who are seeing them for the first time. It is priceless. At the end of my last workshop one client told me it was a life-changing experience. That is the effect that this beautiful herd has on so many of us. Although, I have planned my 2018 workshop dates for March, June, and September, I have posted on my website that September is pending. I do not think, in good conscientious, that I could ask people to travel from all parts of the country for a herd of 121 horses, when most other herds are larger and would offer a better chance for photo ops and to observe wild horse behavior and social dynamics. I also fear that it would become too difficult to locate the horses for my clients. From a human perspective, this gather would be beyond sad for all of us who appreciate these wild horses and have grown to love them. From a horse perspective, it would be both physically and mentally traumatic for the family bands and individuals within the herd and devastating for the health of the herd as a whole to take the numbers down to the low end of AML (121 horses). In addition, any horses removed could face a terrible fate if Congress approves “euthanasia” as a solution for horses in holding. As stated by geneticist, Dr. Gus Cothran, 150-200 horses are necessary to maintain a healthy herd. For this reason and those stated above, I believe that an aggressive contraception (PZP) program should be given time to control the numbers before any other means of population control is used. Since the BLM has so much on its plate, I think it is important to increase the number of volunteer darters and to give them autonomy to proceed in the field independently, instead of under the supervision of a BLM employee. That is how it works on some of the other horse ranges/HMAs that have been very successful in controlling population growth with PZP. We all know that use of in-the-field darting, with perhaps bait and water trapping added to facilitate the process, is the most economical and humane way to control our wild horse population. I recommend that the BLM reevaluate the current Appropriate Management Level and consider raising it. I understand that the last time a range assessment was done was in 2003. Having observed, for a number of years, the spectacular body condition of the majority of the herd, I do not think that a burn area of 11-17% (I have heard varying numbers) of the horses’ range will have an impact on their health or wellbeing. I commend your plan for the burn area to curb cheat grass from re-growing, the presence of which cannot solely be blamed on the horses either, and to reseed with quality grasses. I understand the need to fence it off for a period of time in order for the grass to take hold, and do not think that will have an impact on the health of the horses. On a managed area of over 240,000 acres, I believe there is more than ample acreage for both the wild horses and livestock to forage. If need be, more of the over 500,000 acre Herd Area could be opened up to the horses. In regards to the declining sage grouse population that needs grass 7” high, I do not believe it is the horses that should be solely blamed and the ones penalized when the number of cattle and sheep using the area far outnumber them. Also, you cannot leave human impact out of this. The number of vehicles I see driving off-road astounds and saddens to me. I have even witnessed them chasing the horses. It seems to be worse around Simpson Springs and south of there, which I believe is closer to part of the sage grouse area of concern. There are new tracks every time I visit the area. More signs are needed. Follow through with fines. This HMA can accommodate cattle, sheep, sage grouse and the horses if the right actions are taken. Please consider fencing off the prime sage grouse areas, and seriously looking at the number of cattle and sheep that affect those targeted areas and what can be possibly done to divert them, rather than hastily deciding to remove horses. Most important, when the BLM has publicly announced that it has decided to reevaluate its sage grouse protection plan, why would you act so hastily to decimate this herd? The main part of the herd does not even use the area in question and the horses near Simpson Springs most like have minimal impact. If the sage grouse areas of concern in that area were fenced, it would protect them from cattle, sheep, wild horses and humans. I am in total agreement with the following statement issued by Wild Horses of America Foundation: “We strongly suggest if a removal occurs that: vastly fewer than 325 horses are removed, bait and water traps are used in place of helicopters, emphasis be placed on those horses that inhabit areas of the range that impact sage grouse habitat, emphasis be placed on removing horses only from areas where the public is not as likely to find and see wild horses, younger and more adoptable horses (sub 5 years old) are removed while leaving older horses on the range, that the BLM works with local advocates to place the horses in good adoptive homes, and horses are only removed from the range at a rate at which adoption can keep up.” Once again, thank you for the opportunity to comment and for you consideration.
9	Yes	Policy / Wild Horses	I am totally against reducing the Onaqui Wild Horse herd, or any BLM wild horse herd by rounding up the horses and reducing the current 450 herd by 325 thus resulting in a small herd. These horses should run free and the herd should be maintained by sterilization, not culling!! I love these wild horses; they are the icon of America. I actually travel throughout the west looking for these beauties.
10	No	Policy / Wild Horses / Livestock	This letter is to make the wishes of at least four of us known in regard to the future gather on the Onaqui HMA, and day to day management decisions. 1-We request that two or three of our group be in attendance and have a voice as to which mustangs are turned back out. We feel top priority should be given to keeping families together. 2-We feel that chasing mustangs eight to ten miles with a Helicopter on a dead run is animal abuse. I was at a Cedar Mountain gather a few years ago and saw first hand mustangs coming from the Cedar Spring (9 1/2 mi.) area as fast as they could run and the helicopter right on their tails. 3-We feel that installation of the cement trough at the Cat Tail pond about a mile west of Simpson Spring was a huge mistake. The cement trough has approximately twenty feet of drinking area for the mustangs. The Cat Tail pond has over one hundred fifty feet of drinking area. Eighty head of mustangs fighting over twenty feet of trough causes broken legs. The Cattle Owner's argument that his cows would fall through the ice could have been remedied by fencing the Cat Tail pond at a much smaller expense. There are two cement troughs not far to the south of the Cat Tail pond for the cows. The mustangs usually eat snow when available, and would have access to the open pond just below Simpson Spring. in the winter. 4-With the limited quantity of water available in the west desert it is our opinion that more needs to be done to eliminate the waste of the water. The water from Winter Spring and Simpson Spring overflows the ponds continually, until it sinks into the ground wasted.
11	No	Policy	Is it really population control or just devastating a herd of horses that will no longer be genetically viable? We want these horses, these treasures that inhabit our country, to remain here for generations! We want them on the plains and ranges were they have survived for centuries and where they will face natures challenges naturally. Some will die, some will reproduce but, it should happen not by our hands but by nature! Please consider alternatives. Removing them and putting them in holding pens risk injury and stress Why must me interrupt their life cycle when there are volunteers, as in the Wild Horses of America Foundation. that are willing and able to implement a larger and more humane population control program. Our humane relationships with each other and the creatures that we are responsible for, seems to be constantly challenged these days! Lets do it the "right way." Please consider alternatives.
12	No	Plea / Policy / Wild Horses	I am writing to you regarding the Onaqui wild horse round up. This will be a tragic lose for the horses and, the folks, including myself who follow these popular horses. Please do not take 72% of these beloved horses and kill them! The BLM wants this, its wrong in every way. The BLM wants to do this to preserve the sage grouse territory. There are very few places where they live together in the HMA. Fences could help solve the problem where needed. Not killing the beautiful horses. Please look at the U.S. Fish and Wildlife Service study in 2012 that didn’t cite the horses as a threat. It did cite energy development, right of ways, fires, invasive species and commercial developers as top threats! The BLM has to focus on fertility control. Their plan to treat 60 mares in FY 2018 is not adequate to slow reproduction. The good volunteers with Wild Horses of America Foundation are ready and able to implement a larger population control program. Please allow them to help. I am seventy five years young and have been following our precious mustangs through out the west all of my life. It breaks my heart to see them herded into pens, and losing their families and freedom. So many of my friends have adopted mustangs, they are a wonderful addition to many homes and families. Sturdy, smart, and faithful, who can ask for more! Recently my friends at “This Old Mare” rescue (illegible) several mares, their colts and eleven blind mustangs. They’re wonderful, gentle, smart and willing to learn. Please save their relatives from slaughter. Visit the “Horse Fair” in Madison WI (Illegible) site. There are dozens of mustangs there every April to show the public what a wonderful addition they are if they can’t stay in their mountain homes. Please do not destroy our national treasures. Thank you for taking your time to read this letter. This issue is so important to so many people and really deserves your time and attention. Horses have played a huge role in our lives throughout the years. I would love to adopt Some mustangs but I can be happy being visiting them. Just being around them gives me a huge lift! God bless and please help these precious animals.
13	Yes	Policy / Wild Horses	Petition/Including 7,798 Names. Wild Horses of America Foundation sponsored the following petition to respond to BLM's proposal to gather and remove a significant number of the Onaqui Mountain Herd. It was first promoted on 23 October 2017, and it received over 8,000 signatures by 31 October 2017. It indicates that many people are interested in saving the integrity of this herd, and advancing the use of contraception to control its numbers rather than gather and removal. This month the Bureau of Land Management (BLM) proposed a significant round-up and removal of 72% of the wild horses of the Onaqui Mountain Herd in Utah. It calls for the removal of "over 32511 horses from a herd estimated at 450 horses (not counting the 2017 foals), with the goal of leaving only 121 horses on a range of over 240,000 acres. Wild Horses of America Foundation works with the BLM to treat these horses with contraception and we spend a significant amount of time on the range. These horses mean a lot to us, as well as to the many photographers, tourists and observers who enjoy seeing them in the wild. Removing over 325 horses would be a devastating blow to this iconic herd. Please accept the following comments and concerns in regard to the Public Scoping Notice relating to Population Control, Gather, and Research for the Onaqui Mountain Wild Horse Herd Management Area Project: We recommend that the BLM not remove any horses from the Onaqui range, and instead increases the number of contraception doses to control herd growth. We are very concerned about removing any horses from any range right now due to the uncertainty of whether Congress will approve 11euthanasia11 as a solution to the approximately 45,000 horses that have already been removed from the range. We do not want to add to this number. We recommend that the BLM reevaluate the established Appropriate Management Level (AML), which is currently 121 to 210 horses. We feel that the range provides enough feed and water to increase the AML. We believe that a large reduction in herd size, particularly considering that the herd is spread out in segregated groups, would put the horses at risk of inbreeding, which may cause genetic problems. We think that this herd is very important to the American public. It provides incredible value to the many tourists, photographers and observers who enjoy seeing this herd in its natural environment. It also provides enjoyment to the thousands of people who follow it through numerous online sources where pictures of the herd are posted. Further, this herd is increasingly driving dollars to the local community (Tooele County, Utah) as tourists travel to visit the horses. We believe that any impacts to sage grouse habitat, wildfire restoration areas and resource impacts can be successfully mitigated/managed without removing 72% of the herd. We strongly suggest if a removal occurs that: vastly fewer than 325 horses are removed, bait and water traps are used in place of helicopters, emphasis be placed on those horses that inhabit areas of the range that impact sage grouse habitat, emphasis be placed on removing horses only from areas where the public is not as likely to find and see wild horses, younger and more adoptable horses (sub 5 years old) are removed while leaving older horses on the range, that the BLM works with local advocates to place the horses in good adoptive homes, and horses are only removed from the range at a rate at which adoption can keep up. Thank you for your consideration.

14	Yes	Policy / Recreation / Wild Horses	Please accept the following comments on the SLM Scoping Notice for the proposed roundup and removal of wild horses In the Onaqui Herd Management Area (HMA). The Public Lands have been a very Important part of life in our family. Most of our free time was spent there when our children were growing up. That is where they learned to respect and value nature and wildlife. I feel that it is a civic responsibility to pay attention to and enter into decisions that impact this irreplaceable treasure that belongs to all of us The Onaqui HMA is one of a few HMAs within proximity to a large city which makes them more accessible for the public to enjoy. This herd is a unique wild horse population that is beloved by visitors who travel to this area solely to observe and enjoy these horses who have been an important part of the Utah's landscape and history. The proposal to remove the vast majority of the Onaqul horses will negatively impact the human enjoyment and recreational use of these public lands. Horse and burro management and control strategies cannot be based on biological or cost considerations atone; management should engage interested and affected parties and also be responsive to public attitudes and preferences. Three decades ago, the National Research Council reported that public opinion was the major reason that the Wild Horse and Burro Program existed and public opinion was a primary indicator of management success (NRC, 1982). The same holds true today. "Using Science to Improve the BLM Wild Horse and Burro Program: A Way Forward" National Academy of Science, This report reviews the science that underpins the Bureau of Land Management's oversight of free-ranging horses and burros on federal public lands in the western United States. The social Impacts on the American public of destroying these Wild Horse Herd populations is overwhelmingly given the strong support the American public has to protect, preserve and view Wild Horses living naturally on protected public lands. The BLM has been given a very great responsibility to manage and protect America's Public Lands, Wildlife and natural resources. Our Wlid Horses and Burros are very much a part of that. http://dels.nas .edu/resou rces/static-assets/materials-based-on-reports/reports-lnbrief/wild-horses-report-brief-fina l.pdf [photo not included here].An occasional visitor to mustang territory is Rep. Jason Chaffetz. He sometimes stalks the horses with a camera and has captured several Impressive action shots. They're graceful: they're beautiful,' Chaffetz said. But they like to fight, too. And that's the fun of it.The Onaqui herd has roamed near Dugway Proving Ground for decades with little public notice. But more and more, the horses' solitude has been challenged by growing numbers of recreationists, gawkers and photo buffs. ALTERNATIVES THAT MUST BE CONSIDERED IN THE ENVIRONMENTAL ASSESSMENT: Restore Herd Area territory to active management status, thereby increasing the size of the Onaqui HMA to the 507,681 acres originally designated by Congress; Designate the Onaqui HMA as a National Wild Horse Range due to its proximity to Salt Lake City, the accessibility of the Onaqui herds for photographing and wild horse viewing, the popularity of this herd with visitors and tourists and the economic benefits of the Onaqui horses to the local area; Increase the allowable number of horses (AML) in this HMA to, at minimum, accommodate the current population level, making forage adjustments, if necessary, pursuant to CFR 43 C.F.R. 4710.5(a) to ensure that wild horses are given equitable usage of our public lands; A leader in the field of equine population genetics Is Dr. Gus Cothran, Director of the Equine Blood Typing Research Laboratory at the University of Kentucky. In addition to blood and hair samples collected from horse breeds around the world, Dr. Cothran has been analyzing blood samples from U.S. wild horses. He has been studying the Pryor Mountain wild horse herd of southern Montana since 1991 as well as other wild horse herds on public lands in the West. Dr. Cothran suggests that managing wild horses at low population levels leaves them vulnerable to a long range loss of genetic diversity. This is the same sorl of problem which plagues endangered species around the world. But, just how small is too small? At what point do wild horse populations suffer the risk of irreparable genetic damage? Based on his DNA analysis, Dr. Cothran now believes that the minimum wild horse and burro herd size is 150-200 animals. Within a herd this large, about 100 animals will be of breeding age. Of those 100, approximately 50 horses would comprise the genetic effective population size. These are the animals actually contributing their genes to the next generation. Dr. Cothran has stated that 50 is a minimum number. A higher number would decrease the chances for Inbreeding. PRIORITIZE FEDERALLY-PROTECTED WILD HORSES The WFRHBA also authorizes designation of specific ranges for wild horses and burros. “Range’ means the amount of land necessary to sustain an existing herd or herds … and which is devoted principally but not necessarily exclusively to their welfare In keeping with the mu/tip/a-use management concept for the public lands'. 16 uses§§ 1332(c), 1333(a). http://anlmallawcoalitlon.com/can-the..wild-horses-and-burros-be-saved/. Thank you for considering my comments
15	No	Plea / Livestock / Wild Horses	Please do not round up this horse population. Please allow them to live on their land in peace. Why do you want to remove them from their homes? So people can have cows? That is dumb and does not make sense. Just let them be. The BLM is rounding up way too many horses, separating mothers and fouls and ruining family bands. These are living animals with feelings and emotions. Have some empathy. The majority of Americans want them to be protected and to remain wild. Wild horses are staple of America and let's leave it that way. These horses are healthy and happy where they are. We know they are healthy, please do not use false excuses saying they are not. Stop rounding up wild horses.
16	Yes	Wild Horses / ESR	I am writing to urge you to not remove the Onaquie Herd of wild horses. Accept the following comments on the BLM Scoping Notice for the propos roundup and removal of wild horses in the Onaqui Herd Management Area (HMA). The Onaqui HMA is one of a few HMAs within proximity to a large city which makes them more accessible for the public to enjoy. This herd is a unique wild horse population that is beloved by visitors who travel to this area solely to observe and enjoy these horses who have been an important part of the Utah's landscape and history. The proposal to remove the vast majority of the Onaqui horses will negatively impact the human enjoyment and recreational use of these public lands. Alternatives that must be considered in the Environmental Assessment: 1. Manage the population with fertility control, not removals in accordance with the recommendations of the National Academy of Sciences (NAS) in its 2013 report, "Using Science to Improve the BLM Wild Horse and Burro Program: A Way Forward." Immediately vaccinate a sufficient number of mares yearly to attain zero population growth in the shortest amount of time. Least intrusive methods for application of PZP fertility control should be used, including remote darting and/or bait and water trapping; 2. Increase the allowable number of horses (AML) in this HMA to, at minimum, accommodate the current population level, making forage adjustments, if necessary, pursuant to CFR 43 C.F.R. 4710.S(a) to ensure that wild horses are given equitable usage of o public lands; 3. Restore Herd Area territory to active management status, thereby increasing the size of the Onaqui HMA to the 507.681 acres originally designated by Congress; 4. Designate: the Onaqui HMA as a National Wild Horse Range due to its proximity to Salt Lake City, the accessibility of the Onaqui herds for photographing and wild horse viewing, the popularity of this herd with visitors and tourists and the economic benefit of the Onaqui horses to the local area; 5. Temporarily fence off burn area to allow regeneration without removal of wild horses; and 6. If any removals do take place, they must be small in numbers, incremental and limited to horses who can either be adopted or placed in sanctuaries.

17	Yes	Policy / Livestock / Wild Horses / Greater Sage Grouse / Frustration	As a wild horse and burro advocate and a taxpaying American citizen who has a stake in the sound management of OUR public lands and the protection and preservation of OUR endangered wild horses and burros currently being managed by the Bureau of Land Management (BLM), I am submitting my comments on the agency's misguided proposal to roundup and permanently remove over 329 federally protected wild horses from their legally designated range in the Onaqui Herd Management Area (HMA) in Utah. This proposed action would decimate the current population by roughly 75%, leaving these unique and exceptionally popular mustangs at dangerously low numbers, threatening the genetic health of this cherished herd. The BLM's stated goal is to reduce the current "guesstimated wild horse population of 450 individuals to the lowest end of the AML (arbitrary management level) set by the agency of only 121-210 wild horses (which is tantamount to allowing one wild horse per 2,000 acres on this vast 200,000+-acre public lands area), as well as emergency stabilization; restoration of lands affected by wildfires; and collaboration with researchers to establish a study focused on wild horses, greater-sage grouse and vegetation treatment interaction. The BLM feigns concern for a decline in greater-sage grouse, with resource impacts being blamed on a so-called "overpopulation" of wild horses, all the while arbitrarily authorizing several thousand cows and sheep to graze on allotments in and around the same HMA, where wild horses are mandated by law to be the PRINCIPAL users of their own legal habitat - NOT invasive, destructive livestock. Yet the BLM persistently elevates the interests of commercial users, such as welfare ranchers, over the wild equines whom the agency has been legally mandated by Congress to protect. No doubt EXCESS livestock have contributed significantly to the substantial decline of sage grouse over the last decade, yet there is no call for their removal to "save" this endangered bird. Perhaps a serious analysis of the difference of impacts between destructive livestock and beneficial wild equines is in order before the wrong culprit is removed. Might I suggest the BLM eliminate the excess cows and sheep to save the sage grouse. Listing under the Endangered Species Act (ESA) also appears warranted. Not included in the scoping notice is the fact that Interior Secretary Ryan Zinke announced, when releasing the recommendations of his sage-grouse "review team, that the current administration has proposed to actively reduce sage grouse habitat protection ". So obviously the protection of endangered sage grouse is not the driving force behind the proposed removal of the Onaqui mustangs. In fact, the U.S. Fish & Wildlife Service study released in 2012 did not cite wild horses as one of the top five threats to sage grouse but instead cites energy development, transmission right of ways, fire, invasive species, and commercial development as the top threats. that Zinke has openly committed to commercial uses such as industrial development for private profit as he paves the way for their opening on our public lands -- once wild equines and sage grouse are out of the way, of course. BLM must not use sage grouse protection as an excuse to remove mustangs from the area. To address wildfire damage, the SLM could temporarily fence off the burn area for a time to encourage range regeneration and mitigate the "need" for removing the wild horses. If the agency feels damage to the available forage in the HMA is too severe to provide food for the wild horses, then the agency must also remove the livestock. After all, if there is nothing for the mustangs to eat, there can be nothing for the cows to eat either. One thing is for certain, it is imperative that the NO MORE wild horses be removed from the range as such a reckless and deadly action would directly put the lives of these iconic animals in grave danger of being slaughtered, a horrific fate that is hanging over the heads of nearly 100,000 wild horses and burros as I write this. As early as this week, the Senate Appropriations Committee could vote on the markup of the FY2018 Interior Appropriations Bill to decide whether or not to grant the DOI/BLM's request to KILL tens of thousands of captive and free-roaming wild equines. This rogue agency that is mandated by LAW to PROTECT and PRESERVE OUR wild horses and burros on OUR public lands is seeking to KILL/SHOOT ALL HEALTHY wild equines and/or send them to SLAUGHTER, selling them "without restrictions" for the purpose of clearing both the western landscape and government holding facilities of these majestic beings to pander to a small minority of special interests with deep pockets and land grab schemes. The Interior, with extremist slaughter proponent Zinke leading the charge, are also lobbying to resume funding of USDA horsemeat inspections which would open the door for a return of bloody horse slaughter plants on U.S. soil, also putting the lives of domestic equines in peril. All but one member of the BLM Wild Horse Advisory Board, at this month's meeting, even went so far as to approve sending our wild horses and burros to Russia to be fed to tigers. Such blatant disregard for a heritage species that belong to ALL AMERICANS, including future generations, is UNCONSCIONABLE and UNACCEPTABLE! Therefore, this is no time for the BLM to be proposing yet another roundup and removal operation that would only serve to sacrifice the lives of hundreds more of OUR wild mustangs at the altar of avarice. It is clear, the reason the BLM has ramped up its schedule of wild equine roundups and removals in astronomical proportions is the anticipation of the Senate voting in their favor to exterminate each and every wild horse and burro in captivity AND on the range to further their political agendas. This diabolical scheme MUST NOT be approved. The business as usual methods the agency has used over the years - chemical sterilization (overuse of the dangerous fertility control pesticide PZP); surgical sterilization (castrations and ovariectomies); permanent removals; and, of course, ROUNDUP-RELATED deaths (before, during and after capture) - has contributed greatly to the severe decline in wild horse and burro populations, leaving 83% of wild horse herds and 90% of wild burro herds across the west being managed at levels below genetic viability contrary to the minimum-viable population (MVP) guidelines deemed necessary for the survival of the species. As it stands, the BLM's wildly inflated herd population claims of nearly 100,000 wild horses and burros sharply contradict the results of bonafide independent surveys as well as the findings of the National Academy of Sciences 2013 report "Using Science to Improve the BLM Wild Horse and Burro Program: A Way Forward" which not only concluded there is NO OVERPOPULATION of wild horses and burros on our public lands but found the BLM's method of "guesstimating" population numbers highly suspect and not scientifically based. The NAS found the BLM's manner of counting these animals on the range wildly inaccurate and that the method the BLM employs to determine AMLs "is not transparent to stakeholders, supported by scientific information, or amenable to adaptation with new information and environmental and social change," and that "[s]tandards for transparency, quality and equity are needed in establishing these levels, monitoring them and adjusting them." Furthermore, Gus Warr, Utah director of the BLM's Wild Horse and Burro program, has openly declared that there are NO starving wild horses in Utah, a sham perpetrated by the BLM to justify massive removals and "euthanasia" of wild equines for "humanitarian" reasons. Eyewitness evidence disproves claims by horse slaughter proponents in Congress that 11euthanasia" (KILLING) is the 11 humane" option for dealing with the scores of so-called “starving” wild equines whom they falsely claim are dying all across the western range but who, in fact, do not exist. This is merely a smokescreen to convince uneducated legislators to grant BLM1s request to slaughter our protected wild horses and burros in masse. In reality, the majority of wild horses and burros are HEALTHY and THRIVING, NOT dropping like flies from starvation. However, the BLM isn't about to let the truth get in their way of its wild equine wipeout and land grab agendas. Pulling numbers out of the sky is NOT science. For instance, claiming that 80 wild burros removed from a herd of 175 leaves 635 burros is pure fiction! By persistently making such ludicrous population "guesstimates" in an attempt to pass off such physically impossible growth rate claims as fact, the BLM is in clear violation of Title 18; falsifying legal documents. Aside from falsifying data on wild equine population numbers and spewing false claims of "starving" wild horses and burros to justify equicide, the BLM consistently elevates special interests, such as livestock and extractive industries, over that of wild equines whom the agency has been mandated by law to protect and manage as the PRINCIPAL users of their own herd areas. There is a legal term that describes the BLM's current method of operation. "Regulatory Capture" is a form of political corruption occurring when a regulatory agency, created to act in the public interest instead advances the special interest groups' desires that dominate the industry or sector it is charged with regulating. It is a form of government failure that creates an opening for behavior that is injurious to the public and, in this case, injurious to the federally-protected wild horses and burros who belong to all American citizens. The BLM cannot cite unsubstantiated "excess" wild equine populations as justification for roundups and removals without proof by conducting monitoring & inventory studies. BLM also must stop "guesstimating" wild horse herd populations. Such projections of population growth are arbitrary and NOT based on science. The NAS report recommended that BLM bring science to its census counts and make the methodology specific to each area -- not to add a blanket 20-30% increase to all population estimates. For example, within the span of a few weeks leading up to the Advisory Board meeting in October 2017, the BLM's wild equine population estimates went from 67,000 to 73,000 to 84,000 and now "nearly 100,000". One member of the board even projected that within a year or so - if the Board didn't recommend slaughter - there would be 300,000 wild equines on the range! Seriously? Despite the NAS conclusion that NO EXCESS of wild equines on our public lands exists, the BLM persists in claiming that the western range is so overrun with wild horses and burros breeding out of control that there is no available forage or water for them resulting in mass deaths from starvation and dehydration. Ironically, there appears to be plenty of water and forage available for millions of welfare livestock. Selective starvation, how convenient. It is common knowledge that MILUONS of EXCESS, INVASIVE, DESTRUCTIVE private commercial live$tock, which often outnumber wild equines 100: 1, are the real culprits of environmental damage as they lay waste to OUR public lands at taxpayers' expense, along with that of extractive industries such as mining, fracking, oil and gas drilling -- all commercial enterprises that certain factions in Congress, many of whom are ranchers themselves, wholeheartedly support in their quest to exploit our public lands for personal profit while calling for the extermination of a heritage species they feel is standing in their way. Welfare livestock is permitted to overrun OUR public lands despite the fact that a mere 3% of beef comes from the west. The BLM arbitrarily authorizes livestock within legal wild horse and burro habitat where wild horses and burros -- NOT livestock -- are required by law to be managed as the PRINCIPAL users of their own legally designated areas. Contrary to the law, however, the BLM elevates livestock and other commercial interests above those of the species this rogue agency is legally mandated to protect. It is ironic that the BLM repudiates the reasonable conclusion that commercial industries are in any way responsible for range degradation, preferring instead to sentence a handful of protected animals to death to pacify special interests who feel entitled to our public lands for their own personal use. The agency's propensity to protect special interests for financial gain over the interests of our wild equines, who are "fast disappearing from the American scene” and the American taxpayers who must subsidize the rampant destruction of the western range such as welfare ranchers violates their legal mandate to protect our wild equines. Welfare ranchers fail to grasp that their use of OUR public lands to graze their private commercial livestock is a PRIVILEGE, NOT a right, authorized at the discretion of the Interior Secretary alone. They do NOT own OUR public lands. The BLM has the authority to restrict or eliminate destructive livestock grazing for the health of the range but they refuse to use it choosing instead to remove beneficial wild horses and burros who, unlike cattle and sheep, are an asset to the land. The SLM must stop falsely blaming beneficial wild equines for range degradation for which livestock grazing has scientifically been proven to be the true culprits of such damage on our public lands. The BLM must re-evaluate the AMLs to accommodate the present population of wild horses and make forage adjustments, pursuant to CFR 43 C.F.R. 4710.S(a). The BLM is managing wild equines at unsustainable population levels and if this continues they will be managed to extinction. At best, a mere 20,000-35,000 free-roaming wild horses and 4,000 wild burros remain on the western range according to independent, unbiased surveys - NOT the nearly 100,000 wild equines the BLM falsely claims are "breeding like rabbits". The National Academy of Sciences (NAS) in its scathing 2013 report of the BLM's Wild Horse and Burro Program stated they found NO OVERPOPULATION of wild equines and the BLM's method of “guesstimating” wild equine herd numbers as NOT SCIENTIFIC and highly suspect. In fact, wild equines have been minimized on our western ranges being given less than 16% of forage on less than 12% of public lands as the DOI consistently favors money- making enterprises over the welfare of a protected species yet it is our wild horses and burros who are scapegoated for the failure of federal land managers to hold profit driven and massively subsidized industries accountable for the damage THEY have done to our public lands. Additionally, reducing the unique Onaqui wild horse herds by nearly 75% would fly in the face of multiple-use by negatively impacting the recreational use of this public land area to the detriment of wild horse watchers who visit the area specifically to view or photograph these cherished mustangs. Furthermore, the precariously low AML of 121 mustangs does NOT constitute the carrying capacity for the wild horses in the Onaqui HMA but rather the number the BLM arbitrarily allows to exist in this herd area where authorized livestock grazing has been elevated by the agency as the principal users of this legal wild horse habitat. This violates the Wild Free-Roaming Horses and Burros Act which declares that wild equine herd areas are to be "devoted principally but not necessarily exclusively to their welfare in keeping with the multiple-use management concept for the public lands". The BLM consistently ignores this mandate for the benefit of special interests. To comply with the law, the BLM must vastly reduce, if not entirely eliminate, the overpopulation of invasive livestock to ensure that the Onaqui wild horses are given their fair share of available forage and living space. In fact, once the feral livestock is removed, the AML must be raised to the sustainable levels recommended by BLM's genetic expert Gus Cothran to ensure genetic health and viability of wild equine herds. Cothran advises a bare minimum of 150-200 animals, of whom 100 must be adult breeders. Of those 100, approximately 50 mustangs (or burros) would comprise the genetic effective population size, stating 50 as the minimum number. Of course, a much higher number would greatly decrease the chances of inbreeding among the herd, minimizing the probability of extinction. Skewing ratios favoring males would also call for a higher population number. The NAS stated in its report, "The Cothran studies are excellent tools for BLM to use in managing herds to reduce the incidence of inbreeding” a statement that failed to support the BLM's policy of managing wild equines at nonviable levels. It seems foolish for the BLM to ignore the findings of a report the agency itself requested at a cost of $2 million simply because they do not like the results. There are many tools in the toolbox that the BLM has at its disposal - humane alternatives to roundups and removals that do not involve the decimation of a federally protected species. * Along with a moratorium on roundups and removals, the BLM must stop chemically and/or surgically sterilizing our remaining wild herds in its attempt to maintain population levels below genetic viability -- a recipe for extinction. *Instead, the BLM must seriously analyze natural management methods such as encouraging self-regulation among the herd resulting in a balance of birth and mortality. The BLM cannot improve on nature, which when left alone can take care of itself. *To help in achieving self-stabilizing herds, predator protection is key. Eliminating natural predators throws the ecosystem out of whack, even contributing to population growth of mustangs which provides BLM with incentive to call for the removal of so-called "excess" wild horses -- a problem that this

			agency itself creates by allowing indiscriminate hunting of mountain lions. Contrary to BLM claims, wild horses do, in fact, have natural predators (mountain lions) that help keep their populations in check. Where there are large herbivores, there must be a top predator to maintain ecosystem health and keep prey species from overpopulating. A policy must be established to promote the protection of predator species in an effort to restore natural population control mechanisms and restore the "thriving natural ecological balance" in the area. The BLM must eliminate hunting of mountain lions to allow these predators to do their jobs so artificial, invasive management techniques in this wild horse habitat will become obsolete. *Another humane and necessary alternative is returning the 22.2 million acres that the DOI has systematically and illegally STOLEN from wild equines AND ZEROED OUT (land grabs). The 60,000 or so captive wild equines languishing in short- and long-term holding facilities could be relocated back on the range where they belong at no cost to the taxpayer. Regarding the Onaqui wild horses, the BLM should restore Herd Area territory to active management status, increasing the size of the HMA to the 507,681 acres originally designated by Congress. *The historic and irreplaceable Onaqui wild horse herds are a popular and accessible herd who are an asset to the area and are highly valued by Americans and tourists alike, therefore, it is ironic that Utah continues to promote wild horse viewing as a way to attract visitors to the state knowing full well that these living symbols of freedom and the American West are being systematically wiped out to the point where there soon there will be virtually no wild free-roaming mustangs left to view. How deceptive for a state to amass tourism money under false pretenses such as the promise of experiencing the sight of an animal that is in the process of being eradicated. Obviously, you must realize that tourists wouldn't spend a dime for the "privilege" of gawking at a bunch of cows (welfare livestock) or oil wells. In fact, if the truth came out, the majority of Americans would probably choose to BOYCOTT Utah, as I have, rather than pour their tourist dollars into a state that is actively orchestrating the annihilation of OUR national heritage to pacify a small minority of special interests who seek the eradication of wild equines, who belong to ALL OF US. It would benefit the state to take advantage of the close proximity of these mustangs to Salt Lake City to promote wild horse viewing and photography opportunities for visitors to the area which in turn will provide economic benefits for the local community. It would be to the benefit of all - including the wild horses -- to designate the Onaqui HMA as National Wild Horse Range. Wild horses and burros legally and rightfully belong on the western landscape "as an integral part of the natural system of the public lands" and the BLM must fulfill its legal mandate to PROTECT and PRESERVE this heritage species for future generations by ceasing any plans to "manage" our wild herds - including the Onaqui mustangs - into extinction. This includes the current plan to shoot and kill thousands upon thousands of healthy wild equines and/or send them off to be slaughtered. In conclusion, I want to voice my fierce OPPOSITION to the BLM's plan to radically decimate the federally protected wild horses herds in the legally designated Onaqui HMA. This misguided proposal would simply line up these prospective captives to be siphoned through the slaughter pipeline, a grisly fate that these majestic and highly valued beings who helped build this nation DO NOT DESERVE. As one of the 80% of the American People who adamantly OPPOSE equine slaughter and who demand the presence of OUR wild horses and burros on OUR public lands in the west, I strongly urge the BLM to cancel this proposed roundup and removal operation immediately. I, along with the majority of the American public, fully expect the BLM to seriously consider and accept ALL comments and provide an accurate and truthful account of the positions of the public who commented on this extremely important issue, as your agency is legally required to do under NEPA.

18	Yes	Policy / Wild Horses	Chapter 1 (Objective): To enter into a collaborative relationship with the Bureau of Land Management (BLM) to provide for the humane and scientific management of the wild horses in the Onaqui Mountains Herd Management Area in Utah. The purpose of this partnership will be to stabilize and reduce herd growth through the intensive use of the PZP fertility control vaccine in order to maintain a balance between multiple uses of these public lands. The program would be overseen by the BLM and implemented in cooperation with the non-profit partners using private financial and volunteer resources. Chapter 2 (About the Organizations): Wild Horses of America Foundation is a Utah-based non-profit organization dedicated to promoting and implementing humane management of wild horses using the PZP fertility control vaccine. This contraceptive approach offers a minimally invasive solution to ensure the best quality of life possible to these wild horses and burros. The use of contraception allows horse and burro herd growth rates to be managed without using the disruptive round-up and removal strategies that are commonly employed. The American Wild Horse Campaign (AWHC) is the nation's leading wild horse advocacy organization. AWHC is dedicated to preserving America's wild horses and burros in free-roaming herds on our Western public lands for generations to come, as part of our national heritage. AWHC defends America's wild horses and burros to protect their freedom, preserve their habitat, and promote humane standards of treatment. Chapter 3 (About the Onaqui Herds): The Onaqui Mountain wild horses roam within the 500,000-acre Onaqui Mountain Herd Management Area/Herd Area in Tooele County, Utah. Although the total census count for the Onaqui may be 450, the Onaqui Mountain wild horse population is comprised of at least four distinct sub-herds that tend to stay fairly segregated from one another. The Onaqui wild horses are unique in comparison to many other wild horse populations in the West. They aggregate in large herds, with bands acting together, travelling in the same direction and watering at the same time. Each of these herds are comprised of multiple bands with important social bonds. Each horse has a place in the hierarchy within the band and each band has a place in the hierarchy of the herd. The collective behavior of the herd may be an adaptation to living on wide open plains and the fact that there is safety in numbers. This makes the herds very visible to the public and very impressive to witness. As a result, the Onaqui is a very popular destination for wild horse watchers and photographers. Davis Mountain Herd – This is the largest, and most widely-watched, accessible group. These horses usually stay north of the Pony Express Road and often are on-and-around Davis Mountain. They also venture up to the Dugway fence on the north, and to the east as far as the Terra Road through the area where the fire was this summer. We estimate that the horses in this area number around 180* horses. Simpson Springs Herd – These horses tend to stay to the south of Simpson Springs, and to the west of the Simpson Mountains. We estimate is that there are approximately 130* horses in this group. East Onaqui Herd – This group stays to the east of the Onaqui Mountains and west of Highway 36. They are difficult to approach, and act much more like typical wild horses when it comes to keeping distance from people and vehicles. When Wild Horses of America Foundation did an aerial count last year, we estimated 50-60* horses were in this area. Erickson Pass Herd – Not much is known about this group. Our best guess is that there are about 30-40* horses in this group. Miscellaneous Groups/bands Solos – There are also various solo horses, and small groups of bands spread throughout the range, and down toward Keg Mountain. This "group" may have about 40-50(?) horses. *Note: These are rough estimates. The Onaqui horses are generally in very good condition. There is no indication that any of the Onaqui are thirsting or starving, which runs contrary to the narrative pushed by those advocating for large removals from from HMAs in general. At the current population of 450 horses, the density on the 240,153 acres of the HMA equates to over 533 acres per horse! The AML of 121 horses would equate to almost 2,000 acres per horse. Either figure is a low stocking rate. On that same range we have thousands of cows grazing (6 months out of the year), and thousands of sheep moving through the Pony Express Road corridor. The greater Onaqui Herd Area of 507,681 acres, which includes range where some of the horses roam, indicates that the acres per horse figure is even higher. Unlike in many areas of the West, there are no conflicts with livestock in the Onaqui HMA, even at the current wild horse population level. Ranchers, advocates and BLM employees maintain good relationships. There is enough forage for livestock and horses, and the ranchers are good about leaving water turned on for the horses. The Onaqui herds are part of the history of Tooele County. Historic evidence from the Library of Congress 1904 mention wild horses existed in these exact areas. With headlines: Wild Horses Roam the Wasatch Range, Tooele County. The article can be found here: http://chroniclingamerica.loc.gov/lccn/sn86091025/1915-11-05/ed-1/seq-3/#date1=1789 &index=7&rows=20&words=HORSES+horses+WILD+wild&searchType=basic&sequence=0&state=Utah&date2=1943&proxtext=%2Awild+%2Ahorses&y=14&x=13&dateFilter Type=yearRange&page=1. Chapter 4 (National Significance of the Onaqui Wild Horses): Due to its proximity to Salt Lake City and the accessibility of its wild horses, the Onaqui Mountain HMA is a popular destination for wild horse advocates, photographers, ATVers, campers, tourists, veterans and others who like seeing them in their natural setting in our west desert landscape. As one example, following are Facebook pages that feature Onaqui wild horses: Wild Horses of America Foundation: 14,000 followers; American Wild Horse Campaign: 600,000 followers; Kent Keller Photography: 16,000 followers; Kelly Jay Photography: 11,000 followers; Dirk Johnson Photography: 2,500 followers; Lynne Pomeranz Photography: 5,000 followers and hosts photography summits on the Onaqui range; and Kimerlee Curyl Photography: 8,000 followers. The Onaqui Mountain Herd is increasingly driving tourist dollars to the state, and particularly to Tooele County. The Onaqui wild horses are a significant tourist destination for Tooele County, and have great potential to contribute to the local economy by bringing eco-tourism dollars. The BLM's proposal to reduce this herd to the low AML of 121 horses would significantly and adversely impact the recreational use of these public lands and the local economy. Chapter 5 (Significant impact to herd dynamics and genetics): The proposal to reach low Appropriate Management Level (AML) by removing over 325 horses would devastate the integrity and dynamics of this wild horse population and its unique herd structure. Destruction of the social bands, in which the lead stallion is the defender of his mares and daughters, can lead to social chaos, inbreeding, breeding of younger mares, increased aggression, and instability. National Academy of Sciences concluded in its 2013 report, "Using Science to Improve the BLM Wild Horse and Burro Program: A Way Forward", that the BLM's management practice of rounding up wild horses and removing them from the range was facilitating high population growth rates and increasing the numbers of horses being removed to holding facilities. The proposed action would also threaten the genetic viability of this unique population. The removal of over 325 horses from this population would mean an overall herd reduction of approximately 72%. Due to the unique sub-herd structure of this population, such a drastic reduction would irreversibly impact the genetic health of this population. It is clear that the proposal to reduce the Onaqui to low AML would set the herd up for genetic problems, and probably require the future reintroduction of horses to broaden the gene pool, which would in turn ruin the historic value of this herd. It seems wiser and simpler to maintain a sustainable number of existing horses with intact social organization on the range. Chapter 6 (A better way): With the Administration's proposal to slaughter or "euthanize" wild horses in holding facilities, there is a distinct possibility that wild horses removed from the Onaqui range will face a lethal future. With 80 percent of Americans opposed to killing or slaughtering wild horses, clearly an alternative path is necessary. Fortunately, the BLM has begun down that path with a PZP fertility control program on the Onaqui horses. This proposal focuses on an aggressive expansion in this program to quickly stabilize population growth and to humanely reduce population numbers over time. This proposal is in line with the recommendations of the National Academy of Sciences, which warned in 2013 that "Continuation of 'business as usual' practices will be expensive and unproductive for the BLM and the public it serves. It will also bring significant cost-benefits to the BLM. Controlling horse populations in the field by darting with PZP at $30 per dose is far more cost effective than roundup and removals, where a helicopter "gather" averages about $1,000 per horse, excluding the costs of keeping each horse in holding. The partnership we offer will bring private funding and volunteer resources to the table, making this the most cost-effective option for the BLM for management of this herd. Chapter 7 (Proposal): As an alternative to the BLM proposed action, which has significant and irreversible impacts, our organizations propose a collaborative agreement to bring private and volunteer resources to assist in the management the Onaqui herds. As mentioned above, Wild Horses of America partners with the BLM to treat the Onaqui mares with PZP delivered by darts. These PZP treatments started in September of 2015. In FY17 (Fiscal Year 2017), a total of 53 doses (primer and booster) were delivered, with a total of 39 mares being fully treated. The unofficial goal for FY18 is to fully treat 60 mares, with the informal goal that treating more is very acceptable. The number of mares treated with fertility control in this herd should be significantly increased in order to stabilize the population and decrease it over time. The program we are offering via public/private partnership will include: A. Expand PZP darting with the goal of darting every mare in order to bring the population growth to 0%. In the following years, the goal would be to achieve a negative growth rate and to reach a stabilized and reduced herd by 2023. (Estimating a 10% annual mortality rate and a 5% birthrate). If we are able to dart 100 horses per year, we will have prevented 95 births per year, totalling almost 500 horses over five years (excluding their progeny). B. Utilize bait/water trapping, as needed, to treat mares that are not accessible to dart remotely by rifle. C. Maintain a database of each horse with individual identification, band affiliation, lineage, record of births and deaths and vaccination status for mares. D. Train and certify additional local darters and supplement with out of state darters, when necessary to attain vaccination goals. E. Purchase PZP and equipment and supplies for the darting team. F. To facilitate the increased darting goals, work with BLM to modify current requirement that BLM personnel accompany darters. Adopt policy of other BLM offices that allows volunteer darters to work in the field unaccompanied. G. Implement range stewardship measures, including signs to reduce the amount of off road travel; use of volunteers to monitor water sources; collaboration with ranchers and BLM to provide stable water sources for horses when necessary; contribute financially and/or via volunteer resources to fencing of burn areas. H. Rescue if necessary of horses in the herd if they are fatally ill or injured. I. Our efforts would focus on the Davis Mountain and Simpson Springs herds. If removals proceed, focus should be on less accessible herds, including those in sage grouse habitat. (Majority of Onaqui horses do not impact sage grouse habitat.) We advocate for leaving all Onaqui horses on the range, however, if BLM decides to proceed with removals, the Davis Mountain and Simpson Springs herds should be left on the range due to their accessibility for PZP darting and unique herd dynamics. J. Work collaboratively to place gathered Onaqui horses in sanctuaries to avoid holding facilities and the burden it creates for American taxpayers. Chapter 9 (Conclusion): This Proposal urges the BLM to work with our organizations in a formal partnership for the humane management and stewardship of the Onaqui Mountain wild horses. We urge BLM to take advantage of this public/private partnership to maximize contraception in the management of this popular wild horse herd. We believe this is the path forward to avoid removals, which are unnecessary, unfair to the community, inhumane, expensive, not in keeping with NAS recommendations, and not based on justifiable or scientific reasons. We hope that this Proposal offers solutions and substantiation for the forming of a cooperative NGO agreement for the humane and scientific management of the Onaqui wild horses. This action is wholeheartedly requested by the local and national community, the Wild Horses of America Foundation, and the American Wild Horse Campaign. We look forward to discussing this with the BLM. Thank You.
19	--	--	Same as 13.

20	Yes	Recreation / Wild Horses / Livestock	Friends of Animals submits these comments in response to the Scoping Notice for the Population Control, Gather, and Research for the Onaqui Mountain Wild Horse Herd Management Area Project. The Onaqui Mountain Wild Horse Herd Management Area is a popular destination for locals and tourists that enjoy observing and photographing the unique wild horses that reside there. According to the Scoping Notice, the Bureau of Land Management (BLM) is proposing to roundup over 70 percent of the wild horses in the Onaqui Mountain Wild Horse Herd Management Area. The Scoping Notice indicates that BLM could begin rounding up these horses in the summer of 2018 and continue rounding up wild horses for multiple years. BLM claims the proposed action is in response to the Utah Greater Sage-Grouse Approved Resource Management Plan, emergency stabilization and restoration of lands affected by wildfires, and resource impacts due to over-population of wild horses. BLM also contends that it is collaborating with researchers to establish a study focused on wild horses, greater sage-grouse, and vegetation treatment interaction. Friends of Animals has several concerns about the proposed action and its scope. First, the proposed action would significantly diminish the public's ability to observe and enjoy the wild horses in Onaqui Mountain. Second, BLM has not considered the actual impact of wild horses, compared to other activities on the land, and determined whether removal is necessary. Such analysis is necessary before BLM proceeds with any proposed action. Third, Friends of Animals is concerned that the proposed action has no defined time limit. Range conditions, as well as information about the impacts of BLM's proposed action, change from year to year. As indicated by the Wild Free-Roaming Horse and Burros Act and BLM's implementing regulations and policies, it is important to keep a current inventory of the range and the horses to ensure that management of wild horses is at the minimal feasible level. Thus, BLM should re-evaluate the conditions and its options on an annual basis and limit the scope of the proposal to actions that may be conducted in the upcoming year. Fourth, Friends of Animals requests that BLM consider reasonable alternatives including: (1) adjusting the appropriate management level, (2) natural population controls without administering fertility controls or removing wild horses; (3) studding the interaction of wild horses and greater sage-grouse without removing horses; (4) reducing or eliminating other uses in the area, such as sheep and cattle grazing, that may be detrimentally impacting the ecosystem; and (5) expanding the Onaqui Wild Horse Herd Management Area to include areas originally designated for wild horse protection when Congress passed the Wild Free-Roaming Horses and Burros Act. Consideration of these alternatives is necessary to make an informed decision about how to proceed and how to achieve a thriving natural ecological balance in the area. Neither the Wild Free-Roaming Horse and Burro's Act nor the National Environmental Policy Act authorize BLM to proceed without considering these reasonable alternatives. Fifth, BLM must consider the impact of proposed action on the genetic viability of the Onaqui Mountain wild horses, and whether its proposed actions are consistent with its obligations to manage wild horses as self-sustaining population of healthy animals. This is critical because BLM proposes to decrease the herd by over 70 percent, to only 121 wild horses. This could jeopardize the viability and health of the herd. According to BLM's own equine geneticist, Dr. Gus Cothran, at least 150-200 horses must remain in a herd to ensure genetic viability. Moreover, past reports of the Onaqui Mountain Herd Management area show that the genetic variability was at a critically low level. Thus, BLM should consider increasing the appropriate management level and area available to wild horses. Finally, Friends of Animals asks BLM to consider the stress of capture and captivity on wild horses and the lasting, perhaps permanent, social, behavioral, and physiological impacts on wild horses [Bruce Nock, Wild Horses — The Stress of Captivity, Liberated Horsemanship (2010)]. BLM's EA or EIS must include all reasonable alternatives, information and studies about the current condition of the range, and the social, behavioral, and physiological impacts of each alternative on the affected wild horses. This information is critical to making an informed decision, involving the public in the decision-making process, and complying with federal law. Thank you for the opportunity to comment. Please notify me of further actions impacting the wild horses in the Onaqui Mountain Wild Horse Herd Management Area, and feel free to contact me if you have any questions regarding these comments.
21	Yes	Policy / Livestock / Greater Sage-Grouse / Wild Horses / Recreation / Vegetation / Oil and Gas Leasing	The following are the scoping comments of Western Watersheds Project ("WWP") on the Onaqui Mountains Wild Horse Management Area Environmental Assessment ("EA"). WWP does not take a formal position on wild horses, but we do advocate for the protection and restoration of western watersheds and wildlife, and also advocate for scientifically sound decision-making. Based on all the information we have been able to obtain, it seems likely that the impacts of domestic livestock grazing are far greater in the project area than the impacts of the much-less-numerous wild horses, and thus any reductions in wild horses should await reductions in commercial livestock grazing, to see if livestock reductions can accomplish ecological objectives. Please respond to the issues raised in these scoping comments through the forthcoming EA. Regarding sage grouse, the scoping announcement for this project states the following: "This includes, but is not limited to, actions to comply with the Utah Greater Sage-Grouse Approved Resource Management Plan Amendment (ARMPA), emergency stabilization and restoration of lands affected by wildfires, and resource impacts due to over-population of wild horses. The BLM is also collaborating with researchers to establish a study focused on wild horses, greater sage-grouse, and vegetation treatment interactions. The greater sage-grouse population in this area (the Sheeprocks population) has substantially declined over the last decade and the BLM must take action consistent with the ARMPA's management direction." We also are concerned about the welfare of the Sheeprocks sage grouse population, and its population declines, which have led to the triggering of additional conservation measures under the ARMPA. However, based on conversations with the Salt Lake Field Office staff, the Causal Factor Analysis is not yet completed, and indeed has only recently been initiated. It is premature at this point to conclude that wild horses are a primary (or even significant) impact on sage grouse, particularly given their scarcity relative to domestic livestock. We encourage BLM to present in the Onaqui EA a full analysis of all factors, direct and cumulative, that are affecting this sage grouse population. It will likely be difficult if not impossible to tease out the impacts of wild horses from the impacts of domestic livestock, which presumably ubiquitous throughout the Sheeprocks Priority Habitat Management Area ("PHMA"). Please address in full detail the impacts of livestock grazing, both directly (in reducing grass cover below the 7" threshold necessary for sage grouse hiding and escape cover, damage to riparian habitats used for early brood rearing, barbed-wire fencing and its contribution to collision mortality for low-flying grouse, and the impacts of livestock directly in increasing corvid density and the impact of grazing improvement structures as perches for raptors and corvids) and cumulatively with wild horse grazing. Please provide analysis that separates the impacts of wild horses and domestic livestock, e.g., by providing field measurements of habitat attributes and land-health assessments from grazing allotments lacking wild horses, vacant grazing allotments with wild horses but no sheep or cattle, and allotments with both domestic livestock and wild horses. Where there are problems with overgrazing, we recommend that livestock numbers be reduced first, because the general public derives no benefit from livestock use of public lands, whereas wild horses are considered an attraction by much of the recreating public. In the context of impacts to sage grouse, please address the U.S. Fish and Wildlife Services' 2013 Conservation Objectives Team report. Please also consider the Garton et al. (2015) population persistence study. We have attached both to these comments. We expect the BLM to fully examine the distribution, prevalence, and spread of cheatgrass as it relates to domestic livestock in the Onaqui HMA. Scientific studies show that livestock distribute weed seeds at far greater rates than wildlife, and that cattle in particular are known to accelerate cheatgrass invasion through overgrazing and soil crust reductions. Please be explicit in regard to the extent to which invasive weeds (and the frequent fires associated with cheatgrass) are attributable to livestock versus wild horses. In addition, BLM has recently leases parts of the Sheeprocks PHMA for oil and gas development. You will therefore need to consider the direct and cumulative impacts of oil and gas development and production on sage grouse, as this development has now become reasonably foreseeable. Please also incorporate into your cumulative effects analysis the impacts of off-road vehicle recreation in the area. The low AML for the Onaqui herd of 121 horses, and possibly the high AML of 200 horses as well, as listed in the BLM's scoping webpage, are likely below ecological and genetic minimum viable population (MVP) size. MVP from a genetics standpoint is an effective population size (Ne) of 50 breeding animals, subtracting subadults (as they are not genetically contributing to the breeding population) and then correcting for skewed sex ratios of breeding animals such that there is a 1:1 ratio between breeding males and breeding females. This is expressed by the following equation: $N_e = (4 \times N_m \times N_f)/(N_m + N_f)$. In the case of wild horses, one stallion does virtually all the breeding with all of the mares in a given harem, leading to a highly-skewed sex ratio of breeding animals. The stallion's genetic contribution to the next generation far outweighs the genetic contribution of each individual mare. Using this example, if we have a breeding population of 100 horses (excluding subadults and non-breeders) with 96 breed mares and 4 breeding stallions, the Ne for that population would be 15.4, far closer to the population of breeding stallions than to the population of breeding mares. Please include calculations of Ne for the Onaqui wild horse population resulting from each alternative treatment analyzed in the forthcoming EA, and provide analysis of how this compares to ecological and genetic MVP for the herd. Managing the herd for a resulting Ne size below 50 would be expected (based on the best available science) in inbreeding depression, elevated presence of deleterious alleles in the remaining gene pool, and an increase in incidence of birth defects. This would render the decision vulnerable from a scientific and possibly also a legal perspective. When managing for wild horse population numbers, methods of temporary birth control (i.e., PZP) should be implemented first, to manage wild horses on the range (rather than through removal). It is also notable from a taxpayer standpoint that it makes little sense to remove wild horses from federal rangelands (where they are eating forage for which livestock permittees pay $1.89/AUM) to long-term holding (which costs the taxpayer $39/AUM), and also incur the costs of roundups, transport, and short-term holding. Indeed, while cattle are ecological misfits on arid western rangelands (having evolved in the boggy northern climes of Europe), they are far better suited to the Midwest pastures to which wild horses are being exported, and in addition, cattle are actually suited to the Midwest, and pasturing long-term holding horses there displaces cattle from pastures actually suitable for cattle, while removing horses from pastures ecologically unsuitable for cattle. This makes the whole capture-transport-holding program for wild horses ecologically nonsensical as well. Please address the taxpayer expenditure implications of each alternative in the forthcoming EA. Thank you for addressing the issues contained in these comments, and we will be interested in providing more detailed comments when the EA is released. To that end, please put us on the mailing list for this project and notify us of additional opportunities to participate in this NEPA process.
22	Yes	Policy / Wild Horses / Recreation	Any protocol outlined for the Onaqui herd should be designed with the objective of obtaining information suitable to achieving a long term strategy document; Herd Management Area Plan (HMAP). Tiering actions to suit objectives in underlying decision documents (ie sage-grouse, etc) without first having a solid HMAP is, literally, putting the cart before the horse. Please consider a gradual removal strategy (bait trapping) that incorporates data collection as a primary function, and include flexibility, as an HMAP is drafted. A gradual removal strategy will assist in validating any method utilized to determine AML. AML should be defensible from a perspective that prioritizes preservation of a wild population. The current framework contains variables where wild horses do not have comparable variables (ie critical habitat). Hence an invalid equation exists for range management overall and "equitable multiple use" remains terminology, not measurable fact. HMAP's should be the first priority of any action plan. These documents are crucial to integration, preservation and management. Data collection can be done as part of fertility control protocol. Creating a separate and distinct protocol is a duplication of efforts and a waste of tax payer money. These protocols are readily available and we stand willing to engage in dialogue with your office for purposes outlined in this scoping comment. The protocols identify a valid equation for genetic mapping, identification of critical habitat, behavioral impacts. Each one of those factors is essential toward defensible decision documents. The Onaqui herd is already a "highly managed" population. Acclimation to a human presence creates an educational opportunity that should not be overlooked. Involving the public interest in collection of data, incorporated into fertility control, could create not only a cost saving opportunity but one that builds strong relationships. By utilizing the public interest as an integral part of creation of an HMAP an educated public can become a resource invaluable in areas where herds are not acclimated to their presence. The National Academy of Sciences encourages expanding such actions. The public at large has expressed more than outrage for procedures such as surgical spaying of wild mares. We make the following comment with a clear understanding of the workload required to properly implement fertility control broad scale in HMA's with a much larger project area than Onaqui. We do understand that creation of methodology that has utilization potential in the larger context is vital. We would ask that you consider a protocol that incorporates the data outlined in this scoping comment. Establish a critical habitat preservation strategy, valid genetic equation and behavioral maps. Once those factors are established, prior to any consideration of surgical procedures, consider utilizing the herd as a multi-tool pilot project. Continue utilizing PZP until mares have a foal that reaches reproductive age (herd replication, the legal definition of "wild") and then utilizing GonaCon (or other approved application) to push early infertility (ie "menopause"). The ease of observation of the Onaqui herd would lend itself to modification, or termination, of any protocol that impacted measurable (ethogram) behavior in the herd. We support your work with Wild Horses of America and hope that you expand their involvement. Including your existing partner in any research done at Onaqui will be critical to the agency gaining public confidence, trust and transparency. We stand ready to continue dialogue post scoping letter to assist your office toward the creation and implementation of a successful, defensible, preservation management strategy for the Onaqui HMA.

23	Yes	Policy / Wild Horses / Livestock / ESR / Recreation / Photography	Return to Freedom is dedicated to preserving the freedom, diversity, and habitat of America's wild horses and burros through sanctuary, education, advocacy, and conservation while enriching the human spirit through direct experience with the natural world. Part of our mission is to engage members, donors, visitors, and youth in working for and on behalf of their public lands, and the wildlife, wild horses, burros and natural resources on those lands. We provide support for cooperative projects between non-profits and government agencies, and we involve the public in discourse about management of resources. The Salt Lake Field Office proposes the gather and removal of approximately 325 wild horses to achieve low AML (121-210 horses). Current estimates in the Onaqui HMA are 450 horses. Listed reasons for the gather include compliance with the Greater Sage-Grouse Approved Resource Plan Amendment; stabilization of land affected by wildfires; to decrease ecological impacts by wild horses; and to establish a research study which will focus on the interactions of horses, sage-grouse, and vegetation. In response to the Onaqui Wild Horse Gather/Population Control and Research Scoping Statement, we respectfully submit the following concerns and suggestions: Concern 1: BLM's program of gathering excess horses from the wild and putting them into a limited-success adoption program before then housing un-adopted animals in long term holding has proven inefficient and unwieldy. Further impact to the private sector is irresponsible and unnecessary when reasonable and viable minimally invasive and cost effective alternatives exist, particularly for HMAs where the horses are easily accessed for a successful fertility control program. Additionally, any horses removed from the range at this time are in jeopardy of being destroyed. According to the BLM, all holding facilities are full. Suggestion for consideration in the EA to address Concern 1: It is understood that the Onaqui herd is controlled with a limited amount of on-range darting with PZP. However, implementing an aggressive fertility control program would greatly curb the need for subsequent gathers by reducing the fertility rate on the range, thereby slowing population growth and eventually reducing the population. Slowing the rate of gather while increasing the rate of fertility control would allow treated horses to be returned to the range after a gather. Though there would be a much slower reduction in population numbers and darting and/or capture-and-treat would need to continue over time, there would be a welfare, cost, and labor savings down the line. Additionally, fewer horses would need to enter into the maxed out short- and long-term holding facilities, and the possibility of euthanasia would be avoided. We must firmly state here that we cannot and will not support any management plans which would lead to the BLM turning to euthanasia as a "solution." Concern 2: The BLM continues to phrase all management plans and objectives with an over emphases on the negative range impacts of horses. For example, this scoping document mentions that one of the reasons for reducing wild horses in the Onaqui HMA is so that wildfire affected portions of the range and sage-grouse habitat will be restored. We do not mean to intimate that horses have no effect on their environment. However, how can a thriving ecological balance, with room for multi uses, be achieved when each individual species is analyzed unevenly and without the context of the other uses and users? Public Employees for Environmental Responsibility (PEER) note this unevenness in the BLM's consideration of various "ungulate impacts on range conditions versus those of domestic livestock" (https://www.peer.org/campaigns/public-lands/public-lands-grazing-reform/wild-horses.html): for example, calculations of the impacts to range condition in a BLM and USGS publication (Summary of Science, Activities, Programs, and Policies That Influence the Rangewide Conservation of Greater Sage-Grouse) did not equally analyze cattle versus horses on sage grouse habitat (all sage grouse habitat considered when calculating wild horse impacts, and only sage grouse habitat within grazing allotments which have failed the Land Health Standards [LHS] for wildlife considered when calculating cattle impacts). Some reduction in wild horse numbers in some areas is, of course, appropriate: health of all flora and fauna must be considered in managing wildlife, resources, and activities on public land. Suggestion for consideration in the EA to address Concern 2: If it is a concern that livestock or wildlife would negatively impact areas affected by wildfire, we suggest that the EA address fencing off burned portions of the HMA until the range has improved to an appropriate level for grazing animals to utilize once again. With sage-grouse also of concern, we advise that overall grazing by sheep and cattle, and subsequent grazing limitations, also be addressed. Concern 3: Mares on the Onaqui HMA are currently managed, in a limited fashion, by a non-profit with an agreement to dart mares with PZP. A BLM employee must be present. The percentage of mares darted is not high enough to level out birth rates, let alone begin to reduce the population growth rate. Suggestion for consideration in the EA to address Concern 3: The SLFO must expand its use of PZP on the range and update its agreement with the Wild Horses of America Foundation and/or other non-profit groups so that a system is in place to allow skilled and trained volunteers to schedule their own field days. The BLM has stated that increased use of PZP on the range is a priority, but field offices do not have sufficient staff to implement in-office fertility control programs, and yet it is a difficult and bureaucratically challenging process for NGO's to establish agreements or contracts with BLM field offices. It is contingent upon the BLM – tasked with managing our wild horses on public lands – to develop real and effective protocol and oversight for field darting alongside partnered non-profits. Concern 4: The Onaqui HMA is a popular destination for visitors and photographers wanting to observe wild horses. It is easily accessible and the horses are tractable. Removing horses from this HMA, which is a relatively easy one to manage via other, less-invasive means, seems premature. Suggestion for consideration in the EA to address Concern 4: Consider returning the Herd Area territory to active management status, thereby enlarging the Onaqui HMA to 507,682 acres. This would allow for an increase in the AML. Facilitating longer, slower gathers; increasing fertility control with partnered non-profits; and letting most of the Onaqui herd to remain and be managed on the range and will reduce the need for placement into long-term holding with the very real threat of euthanasia, and allow healthy herds to remain in their environment.
24	Yes	Wild Horses / Livestock / ESR / Greater Sage Grouse / Recreation /	The State of Utah supports BLM's proposed population control and gather activities for the Onaqui Mountain Wild Horse Herd Management project area, which may enable greater control of wild horse herd numbers and allow more humane and ecologically focused management of wild horses in Utah. The Utah Department of Agriculture and Food provides the following scoping comments and information for your consideration. Wild horse numbers are out of control in the Onaqui Mountain Wild Horse Herd Management project area. The Wild Free-Roaming Horses and Burros Act of 1971 established Herd Management Areas (HMA) that were to be managed to "maintain a thriving natural ecological balance among wild horse populations, wildlife, livestock, and vegetation and to protect the range from the deterioration associated with overpopulation." Each HMA has an appropriate management level (AML), which is the population range that will allow the area to maintain its necessary balance between multiple uses. Currently, the Onaqui HMA has an AML of 121-210 horses. The current population is estimated to be 450 horses with an additional 90 animals counting the 2017 foals. This leaves the Onaqui herd level 250 percent larger than is sustainable for the area. Overpopulation of horses has severe, negative effects on other multiple uses within the HMA. In addition to the Wild Horse and Burro Act, the affected area is subject to regulation under Utah's Sage-Grouse Conservation Plan.[1] The Onaqui HMA overlaps substantially with the Sheeprock Mountains Sage-Grouse Management Area (SGMA), which has a sage grouse population that has significantly declined over the past 10 years. Wild horses and burros have been identified as a threat to sage-grouse.[2] Under the Utah Conservation Plan, proper domestic livestock grazing is identified as a benefit by maintaining sage-grouse habitat and invigorating beneficial plant growth. Livestock grazing can be controlled and managed to effectively benefit sage grouse habitat while wild horse herds are much harder to control. Proper grazing in SGMA is controlled through the principles of time, timing, and intensity.[3] Under current population levels, wild horses and burros are having negative grazing impacts under all three grazing principles. The horses remain present year-round (time), they graze new growth during critical growing periods for plant growth and health (timing), and the overpopulation increases the intensity of grazing in the area. Horses severely impact rangeland ecosystems through trampling vegetation, compacting soil, and overgrazing forage plants. These negative impacts on vegetation and soils threaten habitat for greater sage-grouse,[4] bighorn sheep,[5] reptiles, and small mammals. Additionally, horse and burro overpopulation have negative effects on ant populations, resulting in less aerated soils and slower decomposition.[6] Horses have both upper and lower front incisors alongside flexible lips, which allows them to crop vegetation much closer to the ground than other ungulates.[7] This increases the damage done to plants as well as the plant's needed recovery time. Also horses graze 1.25 times more forage than a cow of equivalent mass, leading to more forage being grazed. Finally, horses have round toes, which allow them to paw vegetation out by the root, killing the entire plant.[8] The damage that horse overpopulation causes to plant communities results in increased erosion and soil temperatures, which can alter plant and animal communities.[9] Areas with wild horse overpopulation have fewer plant species, less vegetative cover, lower occurrences of native grasses, and higher presences of invasive species.[10] Areas that exclude wild horses from grazing have been shown to have higher plant density and diversity.[11] Alongside the damage that horses can cause to wildlife and plant ecosystems, horse and burro overpopulation leads to unhealthy horse herds due to a lack of adequate forage and water. Overall, overpopulated wild horses have severe negative impacts on wildlife, plant communities, and their own health when they are not properly managed to maintain certain population levels. Beyond the ecological damage that wild horse herds cause to rangelands, they also inflict economic losses on landowners, permittees, and public land managers.[12] The affected area currently supports 20,549 active animal unit months (AUM), which provide over $2 million in economic benefits for local communities. Additionally, there are 3,268 suspended AUMs, which would provide an additional $326,000 in economic benefits for local economies if they were active. AUMs are suspended due to poor land health conditions, to which the overpopulated Onaqui wild horse herd contributes significantly. If the herd is allowed to continue growing without population control, more cattle AUMs could face suspension and the local economy would face economic losses from the degradation of multiple uses on public land. Unchecked wild horse herds have an average growth rate of 20 percent, resulting in a herd doubling in size every five years.[13] Fertility control and other uses of contraceptives only slow the rate of growth and are insufficient to remove the need for wild horse removals.[14] All in all the Onaqui HMA faces several severe issues that require the removal of overpopulated wild horses. First, part of the HMA was impacted by wildfires this season, reducing forage for the herd. Second, the HMA overlaps with sage-grouse habitat and negatively affects these threatened birds. Third, wild horse population has severe negative impacts on rangeland health. Fourth, the continued growth of the herd threatens the ability of this land to sustain multiple uses including wildlife habitat, recreation and tourism, and domestic livestock grazing. The proposed horse gather is the most effective way to return the Onaqui herd to AML to rangeland health standards, to avoid future economic losses, and protect the health of the Onaqui herd and all multiple uses in the area. The State appreciates the opportunity to provide scoping comments on this important issue to reduce wild horse numbers to appropriate management levels that not only benefit the needs of ranchers, local wildlife, and the environment, but also the wild horses. We look forward to working with the BLM as the process proceeds. Please direct any other written questions regarding this correspondence to the Public Lands Policy Coordinating Office at the address below, or call to discuss any questions or concerns. 1 Conservation Plan for Greater Sage-grouse in Utah 2013 2 Conservation Plan for Greater Sage-grouse in Utah 2013 3 Conservation Plan for Greater Sage-grouse in Utah 2013 4 Doherty, K. E., Naugle, D. E., Tack, J. D., Walker, B. L., Graham, J. M., Beck, J. 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Economic Benefit of Fertility Control in Wild Horse Populations. The Journal of Wildlife Management 71 (8): 2811-2819.

25	Yes	Policy / Wild Horses / Greater Sage Grouse / Recreation / Photography / Livestock	It is alarming to us that a roundup of this size has been proposed. We implore you to consider that removing “over 325” wild horses from this HMA is a devastating proposal that will wreak havoc on this herd. This would be a 72 percent decrease in herd size, making this herd no longer genetically viable, and it would be tragic for the people who enjoy viewing this very popular herd in the wild and know individual band stallions, mares, and their offspring. REMOVAL CONCERNS First and foremost, we are concerned about any proposed removals on any herd management area, nationwide, after the National Wild Horse and Burro Advisory Board (NWHBAB) meeting on October 18-19, 2017 in Grand Junction, CO. There, the board made it quite clear that mass killing is still very much on the table as an option for clearing out the horses in short- and long-term holding. The removal of over 325 Onaqui HMA wild horses could condemn many of them to an uncertain, and potentially lethal, fate. Additionally, the proposed removal of over 325 horses will render the Onaqui HMA herd genetically non-viable. This proposed removal to the low appropriate management level of 121, as previously stated, would be about a 72 percent reduction in herd size. Equine geneticist, Dr. Gus Cothran, has long stated that in order to remain genetically viable, herds must be 150-200 animals in size at a minimum. The National Academy of Sciences Report from 2013 cites Dr. Cothran’s work as a helpful tool for BLM management of herds. “The Cothran studies are excellent tools for BLM to use in managing herds to reduce the incidence of inbreeding…” National Academy of Sciences 2013 Report: Using Science to Improve the BLM Wild Horse and Burro Program – A Way Forward (p.192) Based on information shared by the Wild Horses of America Foundation (WHAF) (a group partnering with the BLM to deliver PZP treatments to the Onaqui herd), these horses operate in five distinct groups with limited interaction as they occupy different geographic areas within the HMA. Each of these five groups contains less than 180 animals, the smallest of which has as few as 30 members. To achieve low AML on this HMA, BLM would not only render the entire herd genetically non-viable, but could put the smaller groups into a genetic free fall. The scoping notice dated September 27, 2017 states the proposed roundup comes in response to several issues affecting the HMA, including “resource impacts due to over-population of wild horses.” After our conversations with members of WHAF who spend a good deal of time on the Onaqui HMA, we feel it would be extremely difficult to point to any direct damage to the land that could be resolved only by reducing the number of horses. If, in the eyes of the BLM, there are legitimate problems with the health of the range, it would be critical to take a look at all of the users of the land and their relative impacts – including cattle and sheep.We believe the Onaqui AML could be and should be higher. A low AML of 121 is not a genetically viable number. The current BLM population estimate of 450 horses throughout the HMA translates to 1,128 acres per horse on the 507,681-acre range, and provides the wild horses with an adequate forage base while leaving resources for other wildlife, including critical habitat for greater sage grouse. SAGE GROUSE HABITAT This scoping notice cites the preservation of sage grouse territory as mandated under the Utah Greater Sage-Grouse Approved Resource Management Plan Amendment (ARMPA) as a significant reason for a massive roundup. However, the area of the Onaqui HMA where wild horses roam is not an area of high sage grouse activity, and the sage grouse territory only overlaps about 50 percent of the HMA, according to the map provided by the BLM entitled “Onaqui Mountains Wild Horse & Burro Areas with Sage Grouse Habitat” (see attached). It is also not listed as a High Priority Sagebrush Focal Area in ARMPA. Instead it is listed as a Priority Habitat Management Area (PHMA) (see attached). In ARMPA, it is stated that using fencing to separate sage grouse territory from livestock on the land is an acceptable way to enhance the habitat, specifically in PHMA. ARMPA, Section 2.2.4: MA-LG-9: “… Where recovery or maintenance is not occurring… reduce pressure on riparian or wet meadow vegetation used by GRSG in the summer by adjusting grazing management practices (e.g., use fencing…)” MA-LG-14: “In PHMA, design new structural range improvements to have a neutral effect or conserve, enhance, or restore GRSG habitat…. Structural range improvements, in this context, include but are not limited to: …fences, exclosures…” We believe this would be an effective approach for wild horse use, as well. This is a much less costly approach than a massive roundup putting horses in short- and long-term holding, which cost the taxpayer $43,201,677 in FY16. It is also more humane, considering the potential for destruction of wild horses and burros in short-and long-term holding. According to cost figures shared during the BLM presentation at the NWHBAB meeting in Grand Junction, entitled “Wild Horse & Burro Program Overview,” the cost of putting 325 additional horses in short-term holding would be $600,242 per year, and long-term holding would be $233,691.25 per year. Congress has indicated to the BLM that there must be a reduction in holding costs for these wild horses and burros. It seems counterintuitive to add more wild horses to holding through a roundup, thereby increasing holding costs, when there is another, more cost-effective option indicated in the very amendment the BLM cites as a reason for this roundup. It also seems illogical to propose a massive reduction to a wild horse herd size on the Onaqui HMA in the name of sage grouse protection when the BLM recently announced intent to reexamine its sage grouse protection plan across 10 western states, including Utah. “On October 5, the Department of the Interior announced its intention to revisit land use plans in 10 western states in order to improve greater sage-grouse conservation…” https://www.blm.gov/press-release/blm-seeks-public-input-greater-sage-grouse “The BLM intends to consider the possibility of amending… the BLM land use plans that were amended or revised in 2014 and 2015 regarding Greater Sage-Grouse conservation in the states of California, Colorado, Idaho, Nevada, Oregon, Wyoming, North Dakota, South Dakota, Utah, and Montana.” https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=dispatchToPatternPage&currentPageId=134121 On October 5, 2017, the BLM announced 10 million acres in six western states including Utah will not be protected as sage grouse focal areas so that mining can proceed on that land. It does not seem logical that this herd will be decimated by the BLM in the name of sage grouse protection, when the extremely destructive practice of mining will be allowed by the same agency on sage grouse habitat. The U.S. Fish & Wildlife Service (USFWS) issued the findings of a study regarding the endangered nature of sage grouse in 2012. Dr. Jeff Manning gave a presentation at the NWHBAB meeting in March of 2013 in Oklahoma City, OK regarding wild horses and sage grouse. According to eyewitness accounts from that presentation, Dr. Manning stated that the USFWS identified habitat loss caused by the following factors as top threats to sage grouse: 1. Energy development 2. Transmission right of ways 3. Fire 4. Invasive species 5. Commercial development The USFWS does not cite wild horses as one of the top five threats to sage grouse. Even former BLM Division Chief Joan Guilfoyle, at that same meeting in Oklahoma City, said, “There is a perception that wild horses have a big effect on sage grouse. We want to deal with reality, not perception.” ON-RANGE MANAGEMENT We feel that more emphasis should be placed on applying fertility control to the Onaqui Herd. At the NWHBAB meeting in Grand Junction, the board repeatedly discussed the benefit of the partnership between BLM and Friends of the Mustangs (FOM). BLM and FOM continue to implement a robust population control program in the Little Book Cliffs HMA. The BLM for the Onaqui HMA is also fortunate to have a partnership with the WHAF, and yet the partnership is not being used to its full potential. We have been told that the WHAF is prepared to enact a robust fertility control program. It seems short- sighted to opt for a costly roundup with subsequent holding costs when management on the range is available to you. Members of the WHAF indicate the unofficial goal for FY18 is to dart 60 mares. We feel that in order to stabilize and reduce the horse population, this number should increase to at least 80-90 mares. With this in mind, the cost of PZP treatments should be accurately discussed. $2,500 is often shared as the cost of treating a mare with PZP. However, this includes rounding up the mare, treating her, holding the mare for a few weeks before treating her again, and then releasing her. Volunteer darting of mares in the field costs about $30 a dose. We believe a cost-effective, well-implemented population control plan for Onaqui is far cheaper and more humane than a roundup, which will incur associated holding costs for over 325 wild horses. This type of management has consumed two-thirds of the BLM budget, over $43,200,000 in FY16. We understand it takes time for PZP to begin to control the population growth of these herds, but the current population, allowing 1,128 acres per horse, would appear to allow for a long-term, cost- effective, on-the-range management solution. THE VALUE OF WILD HORSES The wild horse herd on the Onaqui HMA is extremely popular with wild horse advocates, photographers, and tourists. These horses provide an economic benefit through tourism dollars, both locally in Tooele County and to the entire state of Utah. The Onaqui Mountain Herd is regularly documented by the WHAF on their Facebook page, which has about 14,000 active followers interested in the health and wellbeing of these animals. Furthermore, these horses are a federally protected wild species, and are credited with symbolizing the historic and pioneer spirit of the American West. “That Congress finds and declares that wild free-roaming horses and burros are living symbols of the historic and pioneer spirit of the West; that they contribute to the diversity of life forms within the Nation and enrich the lives of the American people…” Wild Free-Ranging Horses and Burros Act of 1971 They are beautiful creatures that deserve the opportunity to live their lives on their homeland, with their families. BLM has tools at their disposal to manage this population on the range without removing them. Recommendations: 1. We propose an emphasis on population growth suppression programs, utilizing WHAF volunteers who are ready to implement a robust PZP program. We feel that a goal of at least 80-90 mares darted in FY18 would be a good start. 2. We feel an adjustment to the AML for the Onaqui HMA is warranted. In particular, the low end of the AML should be adjusted upward to take genetic viability into account. 3. In implementation and management of ARMPA, we propose that the BLM investigate the range impacts of all of the land users including livestock, not just wild horses, in order to appropriately carry out ARMPA in the extremely important task of preservation of sage grouse. Additionally, we feel it would be prudent to look at the lower-cost option of utilizing fencing to protect habitat rather than costly roundups and holding. 4. We feel that signage on and around the Onaqui HMA to direct local traffic to stay on legal routes would be extremely beneficial. We have heard from advocates on the ground that there has been damage to the land because of off-roading ATVs and other motorized vehicles. 5. If a roundup does occur, we implore the BLM to reduce the number of horses they plan to remove so the herd remains genetically viable. We would also ask the BLM to focus on rounding up only those animals of adoptable age (1-5 years) that regularly occupy sage grouse habitat, and to do so through the more humane method of bait and water trapping rather than helicopter roundups. We are very grateful for the opportunity to offer our comments and, as always, we appreciate your willingness to listen to our thoughts. I know personally that you care about the wild horses you manage and will always be grateful for your kind and thoughtful consideration of these animals. I believe that Onaqui presents a special opportunity to showcase forward-thinking, cost-effective, humane wild horse management. We will help you in any way we can.

26	Yes	Policy / Wild Horses / Photography / Recreation / ESR / Greater Sage-Grouse	Thank you for the opportunity to deliver my comments and thoughts regarding the proposed gather and removal of a significant number of horses from the Onaqui Mountain Herd (Onaqui). Wild Horses of America partners with the BLM to deliver PZP treatments to mares of the Onaqui herd with the intent of stabilizing herd growth so that it can be managed on the range, thereby precluding gathers and removals. Due to this work, I spend a lot of time on the Onaqui range with BLM employees, photographers, horse advocates and others who are interested in seeing our wild horses in their natural environment. We feel that the proposal to reach low Appropriate Management Level (AML) by removing over 325 horses would be devastating to the dynamics and health of the herd, and to the people who regularly follow, observe, and visit the Onaqui Mountain Herd. Additionally, given that the future of the wild horses in holding is unknown at present, and that they might be euthanized/killed/slaughtered (pick your euphemism), I do not want to see a significant portion of the herd removed and sent to an unknown fate. THE VALUE OF WILD HORSES: While some question the value of America's wild horses and burros since they do not often put dollars directly into anyone's pocket, I believe that they provide great value to those who are uplifted by observing wild horses in their natural habitat. Plus, there is value to those who are unable to visit our wild horse herds, but who enjoy following them online, or just knowing that they are out there living in the "wild west" and adding to that imagery. "That Congress finds and declares that wild free-roaming horses and burros are living symbols of the historic and pioneer spirit of the West; that they contribute to the diversity of life forms within the Nation and enrich the lives of the American people…"Wild Free-Ranging Horses and Burros Act of 1971 The Onaqui Mountain Herd is very popular with wild horse advocates, photographers, ATVers, campers, tourists and others who like seeing them in their natural setting in our west desert landscape. It is becoming increasingly rare for us to be out on the range with the horses and not encounter other observers, often many other observers. And, the people we meet often have traveled from other states with the specific goal of seeing our famed herd. To offer an idea of the herd's popularity, and the interest level of the public regarding the Onaqui, our group's Facebook page, which primarily features photographs and information about the Onaqui herd, has approximately 14,000 followers. And our group is on the smaller end of the spectrum when compared to other wild horse advocacy organizations, whose followers number in the hundreds of thousands, who have sent representatives to visit and report back on the Onaqui. We also have some talented local photographers who feature the Onaqui horses on their Facebook pages: Kent Keller Photography has about 16,000 followers. Kelly Jay Photography has over 11,000 followers. Dirk Johnson Photography has over 2,500 followers. Lynne Pomeranz Photography, though being based out of state, has about 5,000 followers and hosts photography summits on the Onaqui range. Kimerlee Curyl Photography, also from out of state, has close to 8,000 followers, and comes to Utah a couple of times per year to photograph the Onaqui horses. If you haven't visited their pages, I encourage you to do so – they are incredibly talented artists! Wild Horse Tourist, a website that introduces people to Utah's wild horses and burros and gives directions about where to see them, had 2,700 page views over the 30 days prior to 20 October 2017, and 21% (432) of those views were for the Onaqui Mountain Herd. A couple of years ago I ran into a United States Congressman who said he likes to photograph the Onaqui as an escape from his busy life. It is not uncommon to see employees of the National Ability Center (which works with disabled veterans) enjoying the horses, and sometimes they bring veterans to the range. It is clear that the herd has value to those who follow it. Much of the appeal of the Onaqui herd, particularly when compared to other wild horse herds, lies in its proximity to the sizable population of the Wasatch Front and the accessibility of an international airport. Good roads throughout much of the range, and the fact that the horses are relatively accustomed to the presence of people allows much closer viewing opportunities than most other wild herds. The importance of the horses' approachability and accessibility can be summed up by the fact that Dirk Johnson, whose photography is mentioned above, is able to approach the herd and take great photographs. Dirk is a paraplegic, and is restricted to his vehicle when on the range. The accessibility of the Onaqui horses was further exemplified recently when CBS News (national) sent a correspondent to the Onaqui range to film a segment about wild horse issues in the west. It is scheduled to air on 26 October. The Onaqui Mountain Herd is increasingly driving tourist dollars to our state, and to Tooele County. I believe that these wild horses are a significant tourist destination for Tooele County, and that they can help (along with ATV and hunting opportunities, and visits to Bonneville Speedway) deliver dollars to this region. Since the announcement of the gather proposal, I have already heard from a number of people who follow the Onaqui who said they would be much less inclined to visit the herd if the herd size were greatly diminished. A smaller herd size (especially a significantly smaller herd size) would mean fewer horse sightings, more difficult access to horses, and less satisfied viewers. Even though I am usually successful at finding the wild horses on any given day, there are still days when I have a difficult time finding any and I start to wonder, "Who stole all the horses?" Also, I am decently fit and can reach them even if they are grazing in areas where there are not roads (such as on the top of Davis Mountain). But, for many people, hiking long distances in rough terrain is not an option. Fewer horses, means fewer opportunities for people to see them. Since recreational value is an important consideration when it comes to management of the range, we ask that you remove as few horses as possible (certainly not "over 325"), and that you carefully select which horses/groups are removed, so that the value of this herd is not decimated. Given the notoriety of this herd, I suggest it is a good candidate in the future to be redesignated as a Range, which would complement the four other wild horse Ranges in the west, and further increase the herds' contribution as a tourist destination. THE ONAQUI MOUNTAIN HERD(S): Although the total wild horse count for the Onaqui may be 450 (plus the 2017 foals), the Onaqui Mountain Herd is comprised of at least four major groupings of horses that tend to stay fairly segregated from one another. Davis Mountain Group – This is the largest, and probably most popular, group. These horses usually stay north of the Pony Express Road and often are on-and-around Davis Mountain. They also venture up to the Dugway fence on the north, and to the east as far as the Terra Road through the area where the fire was this summer. I would estimate that the horses in this area number around 180* horses. Simpson Springs Group – These horses tend to stay to the south of Simpson Springs, and to the west of the Simpson Mountains. My estimate is that there are approximately 130* horses in this group. East Onaqui Group – This group stays to the east of the Onaqui Mountains and west of Highway 36. They are difficult to approach, and act much more like typical wild horses when it comes to keeping distance from people and vehicles. When I did an aerial count last year I estimated 50-60* horses were in this area. Erickson Pass Group – I don't know much about this group of horses. My best guess, based on conversations with people who know more, is that there are about 30-40* horses in this group. Miscellaneous Groups/Solos – There are also various solo horses, and small groups spread throughout the range, and down toward Keg Mountain. This "group" may have about 40-50(?) horses. *Note: These are rough estimates. Precise numbers are not necessary to validate the points made, below. THE GENETIC IMPACTS OF REMOVING OVER 325 HORSES: If the gather proceeds as proposed and over 325 horses are removed, that would mean an overall herd reduction of approximately 72%! And, this percentage will increase if the herd count is higher and more horses are removed. The Groups mentioned above are very important when it comes to determining any removal numbers, particularly when you consider the importance of genetic viability. With an equal spread, a 72% reduction would reduce the Onaqui Mountain Group to about 50 horses, the Simpson Springs Group to about 36 horses, the East Onaqui Group to about 17 horses, and the Erickson Pass Group to about 11 horses. While there is certainly room to debate the exact numbers, the overall point remains: Many of the Groups that make up the Onaqui Mountain Herd would be at numbers that would not sustain genetic viability. The BLM's lead equine geneticist, Dr. Gus Cothran, believes that herd sizes need to be, at a minimum, between 150-200 animals. "The Cothran studies are excellent tools for BLM to use in managing herds to reduce the incidence of inbreeding…" National Academy of Sciences 2013 Report: Using Science to Improve the BLM Wild Horse and Burro Program – A Way Forward (p. 192). It is clear that downsizing to low AML (121 horses) would be far too low from a genetic viability concern for the entire HMA. And, the prognosis is much, much worse when you consider the potential impacts to the segmented groups of the Onaqui that remain mostly separated. While it is a good thing that the BLM takes hair samples during gathers to assess the genetic health of the herd, and that the BLM can introduce horses to broaden the gene pool if needed, it is clear that the proposal to reduce the Onaqui to low AML would set the herd up for genetic problems, and probably the future reintroduction of horses to broaden the gene pool. It seems simpler to just leave more of the existing horses on the range. RESOURCE ALLOCATION: The Onaqui horses are generally in very good condition. (Some have commented that they are tending toward being a bit plump.) There is no indication that any of the Onaqui are thirsting or starving, which runs contrary to the narrative that some people are pushing as a reason to increase the number of removals from HMAs in general. The current 450 horses spread throughout the 240,153 acres of the HMA equates to over 533 acres per horse! Low AML, which is 121 horses, would equate to almost 2,000 acres per horse. Either figure is a low stocking rate. On that same range we have thousands of cows grazing (6 months out of the year), and thousands of sheep moving through the Pony Express Road corridor. The greater Onaqui Herd Area of 507,681 acres, which includes range where some of the horses roam, indicates that the acres per horse figure is even higher. (Incidentally, the BLM's Onaqui website page shows the HMA range at 507,681 acres, which is actually the figure for the Herd Area.). There are good relationships between the ranchers, advocates and BLM employees who are involved with the Onaqui horses. We do not have the conflicts that are common in other HMAs. There is enough forage to go around, and the ranchers are good about leaving water turned on for the horses. In your letter dated 27 September 2017 (Re: Population Control, Gather, and Research....) you stated that "…resource impacts due to the over-population of wild horses…" is one of the reasons for the removal. I spend a lot of time on the range, and I think one would be hard-pressed to point to any direct damage that could be resolved by reducing the number of horses. While I am not advocating a reduction in cattle or sheep AUMs, if there were problems with the health of the range I would think that you would need to take a hard look at all of the users and their relative impacts. The one, obvious problem with the Onaqui range is that it is replete with cheat grass. But, I doubt this can be laid at the hooves of the horses. Based on resources, the Onaqui is definitely an HMA that could (and should) have its AML raised. Given the history of how AMLs have been assigned to our HMAs, and the sometime arbitrary nature of the figures (as pointed out in the National Academy of Sciences report to the BLM in 2013), I think that a reassessment of the Onaqui range is necessitated. "The Secretary shall manage wild free-roaming horses and burros in a manner that is designed to achieve and maintain a thriving natural ecological balance on the public lands. He shall consider the recommendations of qualified scientists in the field of biology and ecology, some of whom shall be independent of both Federal and State agencies…" Wild Free-Ranging Horses and Burros Act of 1971. On the topic of range preservation, there is evidence of frequent off-road driving on the Onaqui range. Sometimes this is manifest by the simple growth creep of existing minor roads that now go father than they used to, and sometimes it is more blatant when people drive across a completely road less area. The BLM Law Enforcement Officer (LEO) for this area has been great about calling and warning people when she hears about off-roading. I think that the off-road activity could be reduced by: maintaining and posting more of the small signs at the beginning of minor tracks that advise people to stay on existing roads (I understand that these are often knocked down, shot, or run over), creating a PR campaign to spread the word through local media and groups (ATV clubs, off-road clubs, hunting groups, etc.) who can reach people who frequent these areas, and tasking BLM employees who are in the field to politely remind people to please stay on the roads (I understand that this might be more of a job for the LEO, but most of the people I encounter on the range are pretty receptive.) I think much of the damage is being caused by ignorance rather than malicious intent. FIRE: In regard to the wildfire that burned part of the Onaqui range this past July, just under 38,000 acres (per Inciweb.nwcg.gov) were lost, which is about 11% of the HMA, and about 7.5% of the HA. The Davis Mountain Group of horses is the only group that is affected by this reduction in forage, and they still seem to be quite healthy. Fire-damaged range should not be a reason to reduce the number of horses, and particularly not for a reduction to those groups of horses that never visit the fire-damaged part of the HMA. I am encouraged to hear that the BLM is going to try to kill off any emerging cheat grass in the burn area, and work to restore native grasses to this area. The building of a temporary fence to protect the area as it reestablishes could be a good solution. Using water to draw horses, cows and wildlife to other parts of the range could help also. (Until about a month ago the Onaqui Mountain Group was on the south side of Davis Mountain a number of miles from the burn area. They only returned to the burn area when their water source was changed. Lately, after watering at a trough within the burn area, they walk/run miles to spend their days on the low hills north of Davis Mountain where the range was not burned.) GREATER SAGE GROUSE: One of the reasons specified in your letter for a large removal is compliance with the plan to protect sage grouse habitat and populations. Like most wild horse advocates, I also want to see range allocated for wild animals beyond horses. In all of the time I have spent following horses on the Onaqui range I do not remember ever seeing a sage grouse. Maybe this is a bad indicator? Or, maybe it means that the horses are not usually in sage grouse habitat? If indeed there is a trigger on the sage grouse plan that mandates going to low AML, there really needs to be a strong look at cattle and sheep as well. Again, I am not advocating a reduction of cattle or sheep AUMs, but there are thousands of cattle on the range from November through April, and thousands of sheep that get pushed along the Pony Express Road. After review of a detailed sage grouse map provided by the Utah Division of Natural Resources, it is clear that the sheep go through sage grouse areas classified as "general habitat" and "nesting and brood-rearing" areas in very dense bunches and cover a wide swath of ground. The sheep are much more prone to eating a wider variety of forage, and since they are unable to wander freely their impacts are more substantial on a more focused area. If the goal is to keep grass at least 7" tall, or higher, then it is clear that they are likely having a higher impact on the habitat around the Pony Express Road, than are the Onaqui Mountain and Simpson Springs horses that also graze there. Per the Utah Sage Grouse SRMPA, fencing off select areas to minimize the impacts of cattle, sheep and horses, implementing noise restrictions, and the reduction of traffic, may be acceptable alternative methods of enhancing the sage grouse habitat. In regard to the wild horses, I think it makes sense to assess their impact by the Groups I delineated above. The Davis Mountain Group generally stays north of the Pony Express Road (the general boundary of the Sage Grouse habitat south of Davis Mountain). While the horses do go south of the road on occasion, I would estimate that they spend under 5% of their days there. Toward the east, in the area just west of the Onaqui Mountains, the horses are sometime in that section of the delineated sage grouse habitat, but again, they do not spend a lot of time in that area, and much of that area has been denuded by the recent fire. Overall, I would say this group has minimal impact on the sage grouse habitat. The Simpson

			Springs Group has more sage grouse habitat in the areas where they tend to spend time than what is to the north in the Davis Mountain area. While they do go on the east side of the Pony Express road, toward the Simpson Mountains, I do not typically see them in big groups higher up on the steppes. The Group is often more fragmented than the Davis Mountain Group, and I usually only encounter smaller herds in the sage grouse area. Many of the horses stay to the west of the Pony Express Road, which is not within the designated sage grouse habitat. The East Onaqui and Erickson Pass Groups are in sage grouse habitat, as marked on the BLM map titled, "Onaqui Mountains Wild Horse & Burro Areas With Sage-Grouse Habitat." If sage grouse habitat is a motivation for the gather, then it might make sense to focus on the horses that live primarily within the sage grouse habitat. The Davis Mountain and Simpson Springs Groups should be left alone as they have minimal impact. Another consideration would be to focus on removing, or moving, horses from the areas where there are the highest concentrations of sage grouse activity. My understanding is that the higher concentrations are closer to the Sheeprock Mountains, which is not where most of the Onaqui horses range. On another note, it seems ungrounded to propose a drastic reduction to any HMA based on sage grouse protection when the BLM recently announced its intent to officially reexamine its sage grouse protection plan. Any gather plans based on sage grouse habitat should be suspended until we have clear direction as to the future of the protection plans. Further, it is ironic that the Onaqui is facing a drastic reduction in numbers in the name of sage grouse habitat protection, when the BLM/Department of the Interior just announced that 10,000,000 acres across six western states (including Utah) will not be protected as sage grouse focal areas so that mining interests can proceed. "The BLM determined the proposal to withdraw 10 million acres was unreasonable in light of the data that showed that mining affected less than .1 percent of sage-grouse-occupied range…" BLM.GOV. One could make a similar argument that a good portion of the Onaqui herd has little impact on sage grouse habitat. PZP (CONTRACEPTION): As mentioned above, Wild Horses of America partners with the BLM to treat the Onaqui mares with PZP delivered by darts. These PZP treatments started in September of 2015, so we have completed two years on this project. Of course, it takes time to stabilize a population through the use of contraception, but once it happens we will be in a very good place. Gather and removals will be farther and fewer between (if at all), and the end result will be a big savings to the US taxpayer and a boon to the horses who can remain on their native land. In FY17 (Fiscal Year 2017) we delivered a total of 53 doses (primer and booster), with a total of 39 mares being fully treated. The unofficial goal for FY18 is to fully treat 60 mares, with the informal goal that treating more is very acceptable. I do not think that 60 is high enough, and would like to see this goal officially increased to 80-90 mares fully treated in this coming year. And, to increase that number as needed in future years until we gain control of herd growth. Combined, the Davis Mountain and Simpson Springs Groups account for somewhere over 300 horses. These two groups are generally fairly easy to find, and easy to approach on foot. We can get to them and dart them! The other Groups tend to be more difficult to approach. With that said, we have not tried to dart them yet. If they cannot be approached close enough to dart them, or if we cannot stake them out at water holes, we need to consider water/bait trapping so we can treat and release. On the subject of cost, lately I have heard the figure of $2,600 being spread around as "the cost to treat each horse with PZP." To the uninformed, this implies that darting horses with PZP is expensive! However, the $2,600 cost only occurs when the BLM gathers a horse by helicopter, treats it with a primer dose, holds and feeds the horse for a few weeks, treats it with a booster dose, then returns it to the range. The cost to treat a mare in the field is the price of the dose plus the price of the dart, which is just under $30 per dose. Plus, the time and costs for the darter and observer. When a volunteer is used, such as from our group, there is no added cost to the BLM. Controlling horse populations in the field by darting with PZP is far more cost effective than gather and removals, where a helicopter gather averages about $1,000 per horse, and then you have to add the cost of keeping a horse in holding. When the BLM darts a horse, or accompanies our group in the field, as is often the case, the BLM has to apply some hours and vehicle costs to that total cost figure. While this means each dose will cost more than $30, there is no way that figure could remotely approach $2,600 per horse. While I hear there is a cost code for employees to track the time they spend darting, my understanding in talking with a few different employees, is that it is not done with perfect accuracy. It would be great if the BLM tracked these costs so that accurate costs per treatment could be computed and shared. Our group is willing to spend more time and money (at no cost to the BLM) to dart as many horses as needed to control herd growth. One way to increase darting efficiency, and reduce the costs to the BLM, is to allow our group to have more autonomy in the field and not be accompanied by BLM employees as frequently as we have been in the past. This would be a similar structure to how other darting programs are being implemented in BLM-managed herds. We have had a number of groups reach out to us and offer to help with the darting. Also, we are looking into hosting a special training seminar here in Utah next Spring that would allow 6-8 people to be trained by the Science and Conservation Center to administer PZP. While it has been good to have the up-front involvement of BLM employees as the program has been launched, it has also caused some slowdowns due to their having other work obligations, limited hours that they can spend on the range on any given day, and the lack of freedom in their schedule to always take advantage of windows of good weather that facilitate successful darting. With autonomy, our group could pick a number of days in a row where we could camp on the range and dart horses from sunup to sundown. Of course, we would still work closely with the BLM to identify which mares to start on a treatment plan, and to report all of the mares we have darted. As we heard from numerous people at the most recent Wild Horse and Burro Advisory Board Meeting, we need to be using more PZP! We want to help you accomplish this. Wild Horses of America is working toward the goal of converting our field darting notes and pictures to being housed on a phone app that can be used in the filed. We believe that it will enhance our ability to find and identify horses that need treatment. I would like to see no horses removed from the range and allow the contraception treatments to gain control of herd growth. While our group does not subscribe to a "let them run free" type of wild horse advocacy, I do believe that the Onaqui range can sustain the current number of horses. I know that we can continue to improve the contraception management plan for the Onaqui to the point where it not only successfully controls herd growth on the range, but also serves as a model that can be implemented in other HMAs in the state. PROPOSALS FOR THE ENVIRONMENTAL ASSESSMENT General proposals: 1. Remove no horses. Instead, devote some of the money saved toward increasing the use of contraception to gain control of herd growth. "It cost $83,219.14 in 2012 to gather 155 head, remove 34 head and transport them to the holding facility in Delta, Utah." Onaqui Mountain Herd Management Area Fertility Control Environmental Assessment (DOI-BLM-UT-W010-2014-0021-EA) 2. Fully treat (primer and booster) at least 80-90 mares with PZP in FY18, and plan to adjust that figure up in subsequent years as needed to gain control of herd growth. 3. Implement PZP treatment strategies such as bait/water trapping, as needed, to treat mares that are too difficult to dart remotely by rifle. 4. Implement methods to reduce the amount of off-road travel that is occurring on the range to enhance conditions for all users. 5. Enact measures to protect sage grouse habitat and fire restoration areas that do not require the removal of wild horses. 6. Reassess the current AML (121-210 horses) using the latest and best scientific practices. 7. Expand the HMA to include more, or all, of the 507,681 acres of the Herd Area. 8. That the Onaqui Mountain Herd be designated a National Wild Horse Range and expand the size from 240,153 acres to 507,681 acres. If a gather commences: 1. That the focus of the gather is solely to catch the mares that are difficult to dart by rifle on foot, treat them with contraception, and release them back to the range. If a removal commences: 1. If horses are removed, that the number of horses removed should be far, far fewer than the "over 325" mentioned in the scoping announcement. At very minimum, high AML should be left on the range. Over 300 horses, if carefully selected, would maintain most of the integrity of the herd. 2. Use the money saved from removing fewer horses and use it to increase the use of contraception. 3. That helicopters will not be used. Bait trapping is generally a more humane way to gather the horses, and it may have fewer impacts on the horses' future adoptability. Also, this will allow fewer numbers to be removed at a time, and horses that do not fit removal criteria can be released after having a less traumatic experience. 4. That a natural male/female balance is considered when deciding which horses to remove and which horses to release back the range. Do not use sex loading (too many male horses) as a method of trying to reduce the reproductive rate. Use PZP for that. 5. That any horses that are removed will be transferred to a suitable private sanctuary* in Utah, if one is available. And/or, that the BLM will work with local advocates to ensure that every horse is adopted (this should be facilitated by the slower removal of trapping), and only bring horses off the range at a rate sustained by adoptions. 6. That emphasis be placed on: a. Horses that are less acclimated to people, that range in areas less visited by the public, and that are in the sage grouse habitat area. This will maintain the size and viability of the groups of horses most visited by photographers and observers, and will allow for easier PZP darting. b. Horses that are younger and therefore better candidates for adoption. (Older horses may be more habituated to life on the range, and less adaptable to a new life of domesticity. Also, they will not be entering their breeding years, and will be more likely to die sooner from natural causes, which will help to naturally control the herd size.) c. Focus on Groups (as defined above) of horses, as opposed to removing an even spread across all the Groups on the range. This will help retain the genetic viability of the remaining Groups, which will retain larger numbers. Horses in high priority sage grouse habitat should be chosen first. 7. To have a plan to treat with PZP any mares released back to the range. *Private Sanctuary: Wild Horses of America is currently pursuing a few different properties in northern Utah that can be converted to use as a wild horse sanctuary. Thank you for the opportunity to offer my thoughts on the proposal. Overall, I think that the BLM employees in Utah do a great job managing the wild horses and burros on our public ranges. I have found you to be knowledgeable about the horses, caring about the horses, and willing to interact and have discussions with people who have varied opinions. I appreciate it, and I often hear your praises from various horse advocates who are from other states.

27	Yes	Policy / Livestock / Wild Horses / Greater Sage Grouse	Thank you for providing me this opportunity to comment on your plan to gather the Onaqui herd of wild horses to the lower end of their AML which ranges from 121 to 210 wild horses. I have visited this area and searched for the wild horses, and finally found one band of about a dozen. They were beautiful horses, but extremely frightened of people such that even the approach of my car from nearly a mile away sent them into a panic. I had to park my car and proceed on foot to get better observations and pictures of this striking band. I remember how nearly totally dedicated the area was to cattle production, and how all the fencings and plant seedings obviously very much favored the livestock ranchers grazing in this legal wild horse HMA. There had just been a terrific fire through the area, and I could see the results of a seeding program, mainly aimed a favoring livestock. The water sources were also manipulated to favor livestock. After a lifetime of observing the wild horses in many areas throughout the West, I have learned to associate the extreme type of fear that I observed in the Onaqui two years ago with the presence of ongoing persecution by people, most often the local ranchers who graze on these public lands. And I would urge you as BLM officials whose duty it is to protect the wild horses to investigate illegal harassment and killings in the Onaqui HMA. I urge you to be very fair and objective in your study of the ecosystem there and how it relates to the wild horses and not just to use them as the convenient scapegoat, as has been too often the case in the past. This panders to those vested interests who have nearly always targeted the wild horses for discrediting and elimination, or near elimination, in order to continue to receive the hog's share of the resources. I take this opportunity to remind you that to favor these ranching, mining, big game hunting, etc. interests, is really contrary to the Wild Free Roaming Horses and Burros Act, which clearly states that within their legal areas the wild horses, or wild burros, are to be the principal recipients of resources, including space, not ranchers, who already monopolize almost all of the public domain lands! This would be true multiple use. I would further like to take this opportunity to remind you that the wild horses are great preventers of catastrophic wildfires by munching down exuberant vegetation and in many rugged, rocky and steep areas where livestock do not reach. (These areas are often those where such wildfires originate, and often right after the excessive roundups of wild horses/burros.) Hence they do a great service to the entire ecosystem, including the threatened Greater Sage Grouse. I have observed wild horses and such grouse hens and chicks coexisting very compatible in various HMAs in the West, and caution you against again using the wild horses as convenient scapegoats, while turning a blind eye to those factors that truly threaten these upland game birds, such as overgrazing by livestock, OHV destruction of habitat, mining operations pumping of enormous quantities of public land waters and lowering of watertables, toxifying of waters, etc. You should acknowledge the many positive contributions that wild horses make to the Onaqui ecosystem. They represent a restorationg of balance in relation to all the overly promoted ruminant herbivores, such as cattle, sheep, and deer, that are present here, since their post-gastric digestion and less-cutting hoof structure restores nutrient-rich and moisture-retaining soils, disperses seeds of many more species of plants which go on to germinate, including many native ones, that aid species such as the Greater Sage Grouse, open up thickets, access water sources and food sources during winter freezes and summer droughts, etc. These are the kind of more subtle interactions between the wild horses and the other species of plants and animals that you should recognize during your study, not just fall back on the same old prejudiced approaches to investigations of the wild horses. For the above and many other related reasons, I oppose your announced proposal to reduce the Onaqui wild horse herd to 121 wild horses by eliminating 325 wild horses. This would gut this herd and upset its social structure and process of ecological harmonization and niche filling, population stabilization, and jeopardize its genetic viability in the long term. Remember that you are supposed to be the defenders of the wild horses, not just the ranchers, or the hunters, or the miners, etc. You are supposed to treat the wild horses fairly, especially in their own legal areas on the public lands. Millions of people love the wild horses in the wild, for such is a very important part of their experienced quality of life. Their/our interests should not be callously ignored by public employees and representatives who should be people of moral integrity and upholders of all the laws of the land, not dispensers of extreme favoritism. You should give the Relative Proportions of livestock grazing vis-a-vis wild horse grazing within this HMA so that we all have some just perspective on this issue. From my evaluation of this, I can see that present forage allocations extremely favor livestock within the Onaqui HMA. There should be a higher population of wild horses here of at least 500 reproductive adults to achieve genetic viability and livestock ranchers should be reduced to accommodate a more truly viable and thriving wild horse population. Better promotion of public viewing of these beautiful horses should also be promoted. I have a question: are the wild horses able to access Gallinaceous Guzzlers for water in the Onaqui HMA? I hope that next time I visit the Onaqui I will see a lot more wild horses and ones much less frightened than what I saw back in the summer of 2015. Again I thank you for giving serious consideration to my points and wish you every success in fulfilling your very important duty as public lands guardians.
28	Yes	Policy / Recreation / Photography / Wild Horses / Greater Sage Grouse	Do not permanently remove 325 horses (72%) as they might be killed in holding, per the most recent recommendation of the BLM National Advisory Board. Removing these horses will render the herd genetically non-viable per equine geneticist, Dr. Gus Cothran. He advises at least 150-200 horses must remain in the herd to ensure genetic viability. The BLM cites the preservation of sage grouse territory as a reason for removing these horses. Yet, there are only a few places where wild horses and sage grouse live together in the HMA. In those places fencing can mitigate the potential harm to sage grouse in lieu of permanent removal. The U.S. Fish & Wildlife Service released a study in 2012 that did not cite wild horses as one of the top five threats to sage grouse. Instead, it cites energy development, transmission right of ways, fire, invasive species, and commercial development as the top threats.We are very concerned about removing any horses from any range right now due to the uncertainty of whether Congress will approve "euthanasia" as a solution to the approximately 45,000 horses that have already been removed from the range. We do not want to add to this number. We recommend that the BLM reevaluate the established Appropriate Management Level (AML), which is currently 121 to 210 horses. We feel that the range provides enough feed and water to increase the AML. We believe that a large reduction in herd size, particularly considering that the herd is spread out in segregated groups, would put the horses at risk of inbreeding, which may cause genetic problems. We think that this herd is very important to the American public. It provides incredible value to the many tourists, photographers and observers who enjoy seeing this herd in its natural environment. It also provides enjoyment to the thousands of people who follow it through numerous online sources where pictures of the herd are posted. Further, this herd is increasingly driving dollars to the local community (Tooele County, Utah) as tourists travel to visit the horses. We believe that any impacts to sage grouse habitat, wildfire restoration areas and resource impacts can be successfully mitigated/managed without removing 72% of the herd. Stop threatening/harassing the habitat of the remaining Onaqui wild horses!
29	No	Policy / Wild Horses	I have been surrounded by and loved horses since I was able to walk. I have a great respect for all animals but I particularly have a bond with the horse. I know that the wild horses of Onaqui Mountain and wild horses in general have been a bit controversial. I have never been to see the horses but I see them on social media and I have a good friend that goes to see them regularly. It is my dream to go see the herd this fall. I come from ranching and farming heritage which also makes me very practical. I know that ALL the wild horses cannot be saved. There are many wild horses in captivity which is a horrible life for them. It is also very expensive for the tax payer. These horses will never be returned to the range or adopted and it is a ridiculous demand that animal activists have prevented these horses from being used as a food source for those that eat horse meat. Like any other issue, we should try to figure out if what happened in the past is correct so that we can make a good decision for the future. When land, water and food are an issue each user has to be taken into consideration. I see 3 sets of users in this case. 1. The wildlife that originally inhabited this range. This would include the sage grouse which I know overlaps with the wild horse range. There is other wildlife on this land that is effected by the wild horse population, specifically food and water needs. 2. The wild horse herd. The wild horses in fact are not a native species to this land. However, the general public sees this herd as native to the land and the most important user because of the iconic nature of the wild horse. You will always need to take into consideration public opinion. 3. The rancher and farmer who own or have paid to use this land for many years as their livelihood. Ranchers have been using this land as long as the wild horse has. Their importance is great...they work hard to feed us but get the raw end of the deal most of the time. I feel like what has happened to the wild horse in the past has been wrong. Originally they were rounded up and contained cruelly, adopted out to almost anyone, the balance euthanized. The animal activists made things just as bad or worse for the horse. Now wild horses are left to languish in a corral without the capability to live in their herds. Herds on the range have overpopulated and destroyed the grazing for both them, wildlife, and sheep and cattle. Making a change now is in the best interest of all of the users. It must really be a change. There might be a need to cull a number of animals from the range in a humane way. Adoptable horses should be taken and allowed to be adopted. However, there is an abundance of domesticated horses already, the wild horse adoption is not as popular or practical as it used to be. The best solution to the overpopulation is birth control or sterilization. If very few foals are born yearly the population will go down slowly at first but more rapidly as the herd ages, life on the range is a hard life and death occurs regularly. There are also a certain number of bachelor stallions that could be captured and either gelded or sold as a meat source. I have read the letter that lists the number of horses that are proposed to be removed from the range. Management of this herd in the recent past has been done poorly. There is now an overpopulation of animals and now you think the way to correct the problem is to double down on removing animals. However, this can severely damage the herd, both socially and physically. Wild horses are socially and physically dependent on numbers. This allows for diverse breeding to keep the population healthy. Also, taking band stallions or lead brood mares from the herd can damage the herd socially and physically because of their ability to lead and keep the herd fed and in tact. I feel like the best option at this point is birth control and sterilization. Taking a very limited number of horses is most likely neccesary, but taking 70% of the herd will damage it in many ways. Taking horses from areas where they repeatedly damage range of the grouse and ranchers grazing range would be the priority areas. Any control of numbers should be done humanely. Helicopter roundups are not humane in any way. I know there are many people who would ask that no horses be taken from the range. That is not possible, but to do other things to contain the numbers I feel is the first priority. Regularly managing the horses in minimalist ways is also important so that the numbers don't get out of control.
30	No	Policy / Wild Horses / Greater Sage Grouse	My cousin and her husband recently traveled through Utah and were very fortunate to see wild horses from the Onaqui HMA. They posted the pictures on Facebook and the public loved seeing the pictures of these majestic horses. My cousin was ecstatic to have actually been able to see wild horses for the first time in her life and she is in her 60s. I live in Colorado, and I have had horses in my life for 30 years, they are a big part of my life. One of the best and smartest horses I have known, was a Mustang I rescued from going to slaughter. She passed away last year---she was an amazing horse that words can't even begin to describe her attributes. It is partly in honor of her, that I am getting more involved in helping the Mustangs. I am planning to get trained to dart horses with PZP, and am interested in working with the local BLM in Utah and other wild horse advocates to help with fertility control. This is a humane alternative to control the wild horse population in the limited area that they are allowed on the public land in this HMA. This is the direction that I believe the BLM should go versus the brutal helicopter roundups which result in deaths, injuries and capturing the horses to only be held in long term holding facilities and possibly killed if the Stewart Amendment passes through the Appropriations Committee. As I am sure you know, the BLM Advisory Board is even recommending killing all horses in long term holding and considered "excess" on the ranges. Our wild horses do not deserve that. They deserve to be managed on the range that is really the only viable and humane solution. Do not round up over 325 horses as they could be killed in holding, again if the Stewart Amendment passes. If you remove the proposed >325 horses from this HMA, it will leave the herd below a level of genetic viability equine geneticist, Dr. Gus Cothran. He advises at least 150-200 horses must remain in the herd to ensure genetic viability. BLM cites the preservation of sage grouse territory as a reason for removing these horses. Yet, there are only a few places where wild horses and sage grouse live together in the HMA. In those places fencing can mitigate the potential harm to sage grouse in lieu of permanent removal. This would be much more cost effective and humane than a brutal helicopter round up and shipping the horses to languish in long term holding and to enter the pipeline to possible slaughter. Volunteers are ready and able to also help with fence building via the Wild Horses of America Foundation. U.S. Fish & Wildlife Service released a study in 2012 that did not cite wild horses as one of the top five threats to sage grouse. Instead, it cites energy development, transmission right of ways, fire, invasive species, and commercial development as the top threats. BLM must focus on fertility control. The BLM plan to treat 60 mares in FY2018 is not adequate to slow reproduction, we need to dart more mares than that. Volunteers with the Wild Horses of America Foundation are ready and able to implement a larger population control program. I plan to join them, as I stated previously as I am excited about getting trained to dart the mares with PZP at the Billings, Montana facility where they do the training as soon as possible. Please, let the public volunteers dart the mares versus continuing with this roundup.

31	No	Wild Horses	Thank you for the opportunity to wirte to you regarding our national treasures, the wild horses. sir, I will NEVER forget the first time I saw one! I had friends visiting from Germany, and we were driving back from Virginia City, toward Reno. Out of nowhere, the MOST incredible solid white wild horse came up to the side of the mountain & stopped where the VC hiway and mountain met. We were probably 50 feet or so from him, going quite slow already, as my friends were taking pictures, and pulled over to just take in this magnificent animal! It was almost like he was putting on a show for us! He stomped his foot, put his hears up, then gave us a nicker and a small rear! OMG!! I wish I had the picture to share with you, however this was over 20 years ago. I was lucky enough to see that horse a few more times over a couple or so years. Having been raised with horses since age 4, raised around the movie industry as my uncle Chuck, doubled John Wayne for 30 years, and even trained his own horses that duke rode in many of the movies. Uncle Chuck's most favorite stunt horse even won an Oscar:) Horses have been an integral part of my life. I currently have a 36 year old horse I have had for 30 years. He is my best friend, my therapy both mentally and physically, as I am disabled with a neurological disease called systemic reflex sympathetic dystrophy with dystonia. It is rated the most painful disease known to man. On the Mcgil pain scale it is a 42. Amputation WITHOUT anesthesia is rated a 40, stage 4 cancer a 28.... so it gives you a good idea how terribly painful it is and what my life is like. The thing that helps me cope with this terrible disease, is the horses! I can not describe what they give me and how they are capable of lowering stress levels and pain, but it is documented, especially with neurological diseases how therapeutic horses are. Observing them in the wild has been part of my therapy for years now. I also know other people who have dreamed of being able to observe the horses in the wild, and when they had the opportunity to, their experiences are as indescrible as the next! "Willow Allie It's an experience I'll never forget. I went on tour with three other friends. Your taken back to another time when the horses didn't have to fear humans. The mountains surrounding them look like a painted picture, too good to be true of the beauty you are seeing. It was also very healing, any pain I was having was gone. The incredible beauty & strength they have is apparent as you watch them. They are family oriented, wise & protective of their bands. It's an experience you will never forget. Please be their voice & don't let our history be taken away. Unless your not from this country the horses ancestors helped our ancestors. They help to make America prosper. Please keep calling." I can give you many stories like this, however you are a very smart man, you understand the point. they help so many! A country without our wild horses is erasing a piece of our history. The HMA areas are getting smaller and smaller because the ranchers have more money than the wild horse advocates have. Heck I live on 751.00 a month and thank god I have a friend that pays for the food for my old guy! Mr. Preston, I beg you to find a reasonable compromise! the herds have been dwindled to the point of danger. the hers are family orienated just like we are! they mourn each other, miss each oither and love each other like ANY family. PLEASE help us save our national treasure for not only our enjoyment, but for MANY generations to come!
32	No	Wild Horses	My daughter has sensory processing disorder. She has some struggles in life because of it. The one main thing that gives her pure joy is horses. She connects with them in a way that is unspeakable. It's like they are her guide animals. No we do not own any and no we can not afford to provide her with riding lessons at this time. Yes we can take her to the public land to see, watch, talk too and learn from the wild horse herd. It is therapy for her! Below is her personal plea to you to find a better way of working with the herd not just destroying such a large majority of the herd. Please take this to heart as this is a young innocent girls voice of reason. She knows no politics or laws in this matter. She only knows love and patients like the love and patients horses seem to give back to her. “It can do bad stof to the ecosistoum. Horse’s are my fafrit animols if you hit hem that will brak my hari. Name 1 thing thay did to you .I will be vare anger if nyou hrt them. I am vare sad that you mite do it tthay are homlis so do not do it pleys I am begig you do not do it.” Name [protected] age 10. Thank you for taking the time to listen to her plea!
33	Yes	Policy / Wild Horses / ESR / Livestock / Photograph	I am writing in response to the Scoping Letter published by you on September 27, 2017 and in regards to the rounding up of 2/3's of the Onaqui herd. Although I understand the need for population control, it is my understanding that you have one of the most effective PZP plans in the nation and because of this, I see no viable reason offered in the Scoping letter to subject these beautiful animals to such cruelty and hardship as a round-up using helicopters which have a proven track record across the West of initiating fatalities during the operation. Time and again, horses that are subject to this type of gather suffer severe trauma and even death on many occasions. This practice is not only barbaric, but is extreme animal cruelty and should not be tolerated.There were three reasons for this gather stated: 1. Too many horses 2. Greater Sage Grouse 3. Resource Impact due to over-population 1.--The AU of the Wild Horses (using your figures) amounts to about 1 horse for every 98 acres of land. That does not even come close to the definition of over-population of grazing land. With the current PZP-treatment, the effects probably will not be seen for a few years as the older population dies out naturally in the home they have grown in. 2.--In studying the provided map, I see that the area in question for the Greater Sage Grouse habitat is adjacent to, but not over-lapping and is at the far end of the HMA. Being a more frequent visitor to this HMA to photograph and observe, I find few horses anywhere close to the Sheeprock Mtn. area. I would need to see factual data on the exact detriment caused by horses in this area and how the declining numbers of Greater Sage Grouse can be caused by the horses. I would ask that those studies be produced and circulated before tying these two issues together. 3.--For two consecutive years now, wild fires have devastated a large portion of the grazing ground within the HMA. Your reseeding efforts in the area directly outside of Dugway are truly wonderful and a benefit of immense proportions. I did also see that the grazing rights that are present were not curtailed during this period of regrowth, unless my information is incorrect. I would like to have the record set straight concerning this. If the grazing permittee was allowed to graze his full allotment when a large portion of his permitted land has burned, then there is a significant problem in this area. Furthermore, if he is allowed to turn his cattle out now (I understand that is what is happening), then where are the studies and the benchmarks that determine sufficient new growth on your newly planted soil. I would like to add, that this herd, The Onaqui Wild Horse herd, is one of the most beautiful and dynamic herds in the nation. They are viewed and photographed by people from all over the world who come to your area and spend a large amount of tourist dollars to get a glimpse of this famous herd. Also, with the current population control measures being taken by this entity, full population control can be achieved with patience. It won't and can't happen over-night, but the results are assured. So, after this lengthy discussion expressing my concerns, I am finally to the part where I offer my suggestion going forward. To wit: Do not do a helicopter gather. Instead, if the numbers must be reduced, then look for a humane way to separate out some of the large number of young stallions with no band of mares and put them out for adoption. Then, continue to use the PZP treatment and gradually increase that number until a satisfactory level is reached. This will take some patience as I have stated before. This will take some patience as I have stated before. You have done well with this effort, but the corner isn't yet turned. This may be a result of waiting too long (too many horses before starting).
34	Yes	Policy / Wild Horses / ESR	I just returned from viewing and photographing the Onaqui Wild Horses in the great state of Utah last month. This was the sole purpose of my trip to Utah and spent over 19 hours on the range. I would like to see these horses protected in the best possible way. Please accept the following comments for the proposed roundup and removal of wild horses in the Onaqui Herd Management Area (HMA). The Onaqui HMA is one of a few HMAs within proximity to a large city which makes them more accessible for the public to enjoy our national treasure. This herd is a unique wild horse population that is beloved by visitors who travel to this area solely to observe and enjoy these horses who have been an important part of the Utah’s landscape and history. The proposal to remove the vast majority of the Onaqui horses will negatively impact the human enjoyment and recreational use of these public lands. ALTERNATIVES THAT MUST BE CONSIDERED IN THE ENVIRONMENTAL ASSESSMENT: 1. Manage the population with fertility control, not removals in accordance with the recommendations of the National Academy of Sciences (NAS) in its 2013 report, “Using Science to Improve the BLM Wild Horse and Burro Program: A Way Forward.” Immediately vaccinate a sufficient number of mares yearly to attain zero population growth in the shortest amount of time. Least intrusive methods for application of PZP fertility control should be used, including remote darting and/or bait and water trapping; 2. Increase the allowable number of horses (AML) in this HMA to, at minimum, accommodate the current population level, making forage adjustments, if necessary, pursuant to CFR 43 C.F.R. 4710.5(a) to ensure that wild horses are given equitable usage of our public lands; 3. Restore Herd Area territory to active management status, thereby increasing the size of the Onaqui HMA to the 507,681 acres originally designated by Congress; 4. Designate the Onaqui HMA as a National Wild Horse Range due to its proximity to Salt Lake City, the accessibility of the Onaqui herds for photographing and wild horse viewing, the popularity of this herd with visitors and tourists and the economic benefits of the Onaqui horses to the local area; 5. Temporarily fence off burn area to allow regeneration without removal of wild horses; and 6. If any removals do take place, they must be small in numbers, incremental and limited to horses who can either be adopted or placed in sanctuaries.
35	--	--	Same as 8.

36	Yes	Policy / Wild Horses / ESR /	I write to you today with my extremely urgent citizen's comments on the BLM Scoping Notice for the proposed roundup and removal of wild horses in the Onaqui Herd Management Area (HMA). I am strongly opposed to the BLM's ill-considered, scientifically unjustified, dangerous and destructive proposal to remove 75 percent (329) of the estimated 450 wild horses living in this popular HMA. The proposed action would reduce the population to the low AML of 121 horses - nearly one horse per 2,000 acres (over 3-square-miles) on this more than 200,000-acre public lands range. This would render this herd unsustainable in biological terms, and it would destroy an important economic asset, as public viewing of this herd is a well-recognized activity which contributes substantially to the local economy. The AML for this herd is dangerously low, arbitrarily and capriciously determined, and is neither based in science nor been the subject of adequate public review. It is well-documented that the Bureau of Land Management has routinely and flagrantly failed to use adequate (if any) scientific, population-based justification for determining AMLs for wild horse herds, and this proposed action unfortunately continues that irresponsible trend. If allowed to go ahead, the results would be catastrophic to the herd, to the public who enjoy viewing them, and to the local economy. In a 2013 report, the National Academy of Sciences found that the Bureau of Land Management's methods for determining AMLs are "not transparent to stakeholders, supported by scientific information, or amenable to adaptation with new information and environmental and social change." It recommended that "[s]tandards for transparency, quality and equity are needed in establishing these levels, monitoring them and adjusting them." In other words, the population levels for wild horses and burros allowed by the BLM, and on which the Bureau bases its decisions to round up and remove these animals from Herd Management Areas, are insufficiently supported by science and are determined without adequate public input, with the undesirable result that the allowed population levels are far below what both science and public input would support. Unfortunately, since the 2013 publishing of the NAS report, the Bureau of Land Management and its parent agency, the Department of the Interior, have for most part utterly failed to implement the NAS report's peer-reviewed scientific advice, resulting in incalculable and preventable harm to both wild horses and burros and the American public. Instead of continuing this failed model with the instant proposed plan at unacceptable public cost and resulting in unsustainable, extinction-level populations of the very federally protected animals the Bureau is required by law to humanely manage, the BLM must allocate adequate resources to implement the NAS's peer-reviewed scientific recommendations, which would save both federal dollars and lives. Now is an excellent time to start implementing those recommendations, by abandoning the instant drastic proposed removal plan until such time as the Bureau is prepared to recommend AMLs for the HMA which have a basis in population biology, are peer-reviewed, and are arrived at in a transparent fashion with ample opportunity for public notice and comment. As you must surely be aware, he Onaqui HMA is one of a very few HMAs within proximity to a large city, making this herd relatively accessible for the public to enjoy, and thus an especially valuable asset to the economy of the region as an important draw for tourists. Many visitors travel to this area solely to observe and enjoy this unique and beloved wild horse population which is an important part of the Utah's landscape and history. These visitors in turn add substantially to the local economy. Without the Onaqui horses, these tourists would not visit or spend money in the area. Therefore, the ill-considered and short-sighted proposal to remove the vast majority of the Onaqui horses would not only irreparably harm the herd; it would also substantially and negatively impact the the local economy while substantially reducing opportunities for human enjoyment and recreational use of these public lands. THE FOLLOWING ALTERNATIVES MUST BE CONSIDERED IN THE ENVIRONMENTAL ASSESSMENT: The Bureau must re-evaluate its current determination of AML for this herd, using modern, peer-reviewed population biology and allowing for adequate public notice and comment when determining these levels. In re-evaluating AML, the allowable number of horses in this HMA must be up-adjusted to, at minimum, accommodate the current population level, making forage adjustments, if necessary, pursuant to CFR 43 C.F.R. 4710.5(a) to ensure that wild horses are given equitable usage of our public lands; When managing this population, the Bureau must use fertility control, rather than removals as recommended the National Academy of Sciences (NAS) in its 2013 report cited above. To achieve zero population growth, a sufficient number of mares must be immunized immediately and annually to attain that goal in the shortest amount of time. Least intrusive methods for application of PZP fertility control should be used, including remote darting and/or bait and water trapping; The Herd Area territory must be restored to active management status, thereby increasing the size of the Onaqui HMA to the 507,681 acres originally designated by Congress; Due to this HMA's proximity to Salt Lake City and the consequent accessibility of the Onaqui herds for photographing and wild horse viewing by the public, the popularity of this herd with visitors and tourists and the economic benefits of the Onaqui horses to the local area, the Bureau should designate the Onaqui HMA as a National Wild Horse Range; The Bureau should temporarily fence off a burn area to allow regeneration without removal of wild horses; and the preceding comments and recommendations notwithstanding, should the Bureau decide to undertake any removals, these must be incremental and limited in scope. Only horses who can either be adopted or placed in sanctuaries should be considered for removals should any removals take place. Further, aircraft must not be used for roundups due to the inherent and well-documented dangers associated with the use of aircraft in rounding up wild equines. I sincerely hope that you will take my comments and recommendations into account, and that your office will rescind its reckless proposal to round up and remove three quarters of the horses in the Onaqui herd-horses which are not only a treasured natural resource, but also an important and valuable economic resource if left in their wild state in the Herd Management Area designated for them by the United States Congress.
37	No	Policy / Greater Sage-Grouse / Livestock / Photograph / Wild Horses	I am a follower of the Onaqui herd that I found out about from a photographer named Dirk Johnson, who travels to the Onaqui hma and posts beautiful stories and photographs of these wild mustangs on FB. There are many reasons right now to NOT gather ANY of the current approximately 325 Onaqui wild horses. One of my primary objections is the fact that the current agriculture appropriations bill if passed to include language allowing slaughter of healthy horses would send all mustangs gathered to their death, a great and sad loss to all of us who enjoy viewing them in person or through awesome photographs posted on FB by good people like Dirk Johnson. Wouldn't it make financial good sense to wait until after the Ag Committe decides something to even consider a gather? Also, the matter of the Sage grouse habitat being overtaken by just 325 mustangs roaming on over 250,000 acres is not logical. In fact I did look at the map where most of the Sage grouse inhabit, which is upper Simpson Mountain in Utah, and I noticed this to be a tiny part of the 250,000 acres legally allotted to the Onaqui mustangs, who do not tend to stay in that area. It also would seem logical that sheep moving through would damage the area more than horses as sheep move closely together. I also hope against hope that reducing the Onaqui herd at any point take into account the very small number of horses in it, and reducing this number to just 125 horses will lead to inbreeding and mutations. To leave the herd at the same level would make sense; and to employ the many hands on the ground who are volunteering to give $25/mare doses of birth control PZP under the guidance of BLM employees is the most cost efficient option. There are "apps" available to help you track which mares receive the PZP so there would be ministering of each mare receiving PZP birth control. The growth of the herd would then be economically and humanely reduced without any expensive gather. I understand that many people are friendly with the Onaqui mustangs including ranchers, the visitors who come from other states just to see the mustangs in the wild, and photographers who have tracked this popular group of Onaqui mustangs for decades. I respectfully submit my comments to you in hopes that you can use them to fortify the rangeland with the money saved from not gathering mustangs of the Onaqui herd right now. I think it would make a great deal of sense financially and time wise to meet with interested parties voluntarily offering to help BLM staff dart the mares with PZP. Thank you for all you do to protect and nurture our public rangeland and to protect and nurture the Onaqui mustangs of Utah.

38	Yes	Policy / Greater Sage-Grouse / ESR / Livestock / Wild Horses	As a wild horse and burro advocate and a taxpaying American citizen who has a stake in the sound management of OUR public lands and the protection and preservation of OUR endangered wild horses and burros currently being managed by the Bureau of Land Management (BLM), I am submitting my comments on the agency's misguided proposal to roundup and permanently remove over 329 federally protected wild horses from their legally designated range in the Onaqui Herd Management Area (HMA) in Utah. This proposed action would decimate the current population by roughly 75%, leaving these unique and exceptionally popular mustangs at dangerously low numbers, threatening the genetic health of this cherished herd. The BLM's stated goal is to reduce the current "guesstimated wild horse population of 450 individuals to the lowest end of the AML (arbitrary management level) set by the agency of only 121-210 wild horses (which is tantamount to allowing one wild horse per 2,000 acres on this vast 200,000+-acre public lands area), as well as emergency stabilization; restoration of lands affected by wildfires; and collaboration with researchers to establish a study focused on wild horses, greater-sage grouse and vegetation treatment interaction. The BLM feigns concern for a decline in greater-sage grouse, with resource impacts being blamed on a so-called "overpopulation" of wild horses, all the while arbitrarily authorizing several thousand cows and sheep to graze on allotments in and around the same HMA, where wild horses are mandated by law to be the PRINCIPAL users of their own legal habitat - NOT invasive, destructive livestock. Yet the BLM persistently elevates the interests of commercial users, such as welfare ranchers, over the wild equines whom the agency has been legally mandated by Congress to protect. No doubt EXCESS livestock have contributed significantly to the substantial decline of sage grouse over the last decade, yet there is no call for their removal to "save" this endangered bird. Perhaps a serious analysis of the difference of impacts between destructive livestock and beneficial wild equines is in order before the wrong culprit is removed. Might I suggest the BLM eliminate the excess cows and sheep to save the sage grouse. Listing under the Endangered Species Act (ESA) also appears warranted. Not included in the scoping notice is the fact that Interior Secretary Ryan Zinke announced, when releasing the recommendations of his sage-grouse "review team, that the current administration has proposed to actively reduce sage grouse habitat protection". So obviously the protection of endangered sage grouse is not the driving force behind the proposed removal of the Onaqui mustangs. In fact, the U.S. Fish & Wildlife Service study released in 2012 did not cite wild horses as one of the top five threats to sage grouse but instead cites energy development, transmission right of ways, fire, invasive species, and commercial development as the top threats. that Zinke has openly committed to commercial uses such as industrial development for private profit as he paves the way for their opening on our public lands -- once wild equines and sage grouse are out of the way, of course. BLM must not use sage grouse protection as an excuse to remove mustangs from the area. To address wildfire damage, the BLM could temporarily fence off the burn area for a time to encourage range regeneration and mitigate the "need" for removing the wild horses. If the agency feels damage to the available forage in the HMA is too severe to provide food for the wild horses, then the agency must also remove the livestock. After all, if there is nothing for the mustangs to eat, there can be nothing for the cows to eat either. One thing is for certain, it is imperative that the NO MORE wild horses be removed from the range as such a reckless and deadly action would directly put the lives of these iconic animals in grave danger of being slaughtered, a horrific fate that is hanging over the heads of nearly 100,000 wild horses and burros as I write this. As early as this week, the Senate Appropriations Committee could vote on the markup of the FY2018 Interior Appropriations Bill to decide whether or not to grant the DOI/BLM's request to KILL tens of thousands of captive and free-roaming wild equines. This rogue agency that is mandated by LAW to PROTECT and PRESERVE OUR wild horses and burros on OUR public lands is seeking to KILL/SHOOT ALL HEALTHY wild equines and/or send them to SLAUGHTER, selling them "without restrictions", for the purpose of clearing both the western landscape and government holding facilities of these majestic beings to pander to a small minority of special interests with deep pockets and land grab schemes. The Interior, with extremist slaughter proponent Zinke leading the charge, are also lobbying to resume funding of USDA horsemeat inspections which would open the door for a return of bloody horse slaughter plants on U.S. soil, also putting the lives of domestic equines in peril. All but one member of the BLM Wild Horse Advisory Board, at this month's meeting, even went so far as to approve sending our wild horses and burros to Russia to be fed to tigers. Such blatant disregard for a heritage species that belong to ALL AMERICANS, including future generations, is UNCONSCIONABLE and UNACCEPTABLE! Therefore, this is no time for the BLM to be proposing yet another roundup and removal operation that would only serve to sacrifice the lives of hundreds more of OUR wild mustangs at the altar of avarice. It is clear, the reason the BLM has ramped up its schedule of wild equine roundups and removals in astronomical proportions is the anticipation of the Senate voting in their favor to exterminate each and every wild horse and burro in captivity AND on the range to further their political agendas. This diabolical scheme MUST NOT be approved. The business as usual methods the agency has used over the years - chemical sterilization (overuse of the dangerous fertility control pesticide PZP); surgical sterilization (castrations and ovariectomies); permanent removals; and, of course, ROUNDUP-RELATED deaths (before, during and after capture) - has contributed greatly to the severe decline in wild horse and burro populations, leaving 83% of wild horse herds and 90% of wild burro herds across the west being managed at levels below genetic viability contrary to the minimum-viable population (MVP) guidelines deemed necessary for the survival of the species. As it stands, the BLM's wildly inflated herd population claims of nearly 100,000 wild horses and burros sharply contradict the results of bonafide independent surveys as well as the findings of the National Academy of Sciences 2013 report "Using Science to Improve the BLM Wild Horse and Burro Program: A Way Forward" which not only concluded there is NO OVERPOPULATION of wild horses and burros on our public lands but found the BLM's method of "guesstimating" population numbers highly suspect and not scientifically based. The NAS found the BLM's manner of counting these animals on the range wildly inaccurate and that the method the BLM employs to determine AMLs "is not transparent to stakeholders, supported by scientific information, or amenable to adaptation with new information and environmental and social change," and that "[s]tandards for transparency, quality and equity are needed in establishing these levels, monitoring them and adjusting them." Furthermore, Gus Warr, Utah director of the BLM's Wild Horse and Burro program, has openly declared that there are NO starving wild horses in Utah, a sham perpetrated by the BLM to justify massive removals and "euthanasia" of wild equines for "humanitarian" reasons. Eyewitness evidence disproves claims by horse slaughter proponents in Congress that "euthanasia" (KILLING) is the "humane" option for dealing with the scores of so-called "starving" wild equines whom they falsely claim are dying all across the western range but who, in fact, do not exist. This is merely a smokescreen to convince uneducated legislators to grant BLM's request to slaughter our protected wild horses and burros en masse. In reality, the majority of wild horses and burros are HEALTHY and THRIVING, NOT dropping like flies from starvation. However, the BLM isn't about to let the truth get in their way of its wild equine wipeout and land grab agendas. Pulling numbers out of the sky is NOT science. For instance, claiming that 80 wild burros removed from a herd of 175 leaves 635 burros is pure fiction! By persistently making such ludicrous population "guesstimates" in an attempt to pass off such physically impossible growth rate claims as fact, the BLM is in clear violation of Title 18; falsifying legal documents. Aside from falsifying data on wild equine population numbers and spewing false claims of "starving" wild horses and burros to justify equicide, the BLM consistently elevates special interests, such as livestock and extractive industries, over that of wild equines whom the agency has been mandated by law to protect and manage as the PRINCIPAL users of their own herd areas. There is a legal term that describes the BLM's current method of operation. "Regulatory Capture" is a form of political corruption occurring when a regulatory agency, created to act in the public interest instead advances the special interest groups' desires that dominate the industry or sector it is charged with regulating. It is a form of government failure that creates an opening for behavior that is injurious to the public and, in this case, injurious to the federally-protected wild horses and burros who belong to all American citizens. The BLM cannot cite unsubstantiated "excess" wild equine populations as justification for roundups and removals without proof by conducting monitoring & inventory studies. BLM also must stop "guesstimating" wild horse herd populations. Such projections of population growth are arbitrary and NOT based on science. The NAS report recommended that BLM bring science to its census counts and make the methodology specific to each area -- not to add a blanket 20-30% increase to all population estimates. For example, withing the span of a few weeks leading up to the Advisory Board meeting in October 2017, the BLM's wild equine population estimates went from 67,000 to 73,000 to 84,000 and now "nearly 100,000". One member of the board even projected that within a year or so - if the Board didn't recommend slaughter - there would be 300,000 wild equines on the range! Seriously? Despite the NAS conclusion that NO EXCESS of wild equines on our public lands exists, the BLM persists in claiming that the western range is so overrun with wild horses and burros breeding out of control that there is no available forage or water for them resulting in mass deaths from starvation and dehydration. Ironically, there appears to be plenty of water and forage available for millions of welfare livestock. Selective starvation, how convenient. It is common knowledge that MILLIONS of EXCESS, INVASIVE, DESTRUCTIVE private commercial live$tock, which often outnumber wild equines 100:1, are the real culprits of environmental damage as they lay waste to OUR public lands at taxpayers' expense, along with that of extractive industries such as mining, fracking, oil and gas drilling -- all commercial enterprises that certain factions in Congress, many of whom are ranchers themselves, wholeheartedly support in their quest to exploit our public lands for personal profit while calling for the extermination of a heritage species they feel is standing in their way. Welfare livestock is permitted to overrun OUR public lands despite the fact that a mere 3% of beef comes from the west. The BLM arbitrarily authorizes livestock within legal wild horse and burro habitat where wild horses and burros -- NOT livestock -- are required by law to be managed as the PRINCIPAL users of their own legally designated areas. Contrary to the law, however, the BLM elevates livestock and other commercial interests above those of the species this rogue agency is legally mandated to protect. It is ironic that the BLM repudiates the reasonable conclusion that commercial industries are in any way responsible for range degradation, preferring instead to sentence a handful of protected animals to death to pacify special interests who feel entitled to our public lands for their own personal use. The agency's propensity to protect special interests for financial gain over the interests of our wild equines, who are "fast disappearing from the American scene", and the American taxpayers who must subsidize the rampant destruction of the western range such as welfare ranchers violates their legal mandate to protect our wild equines. Welfare ranchers fail to grasp that their use of OUR public lands to graze their private commercial livestock is a PRIVILEGE, NOT a right, authorized at the discretion of the Interior Secretary alone. They do NOT own OUR public lands. The BLM has the authority to restrict or eliminate destructive livestock grazing for the health of the range but they refuse to use it choosing instead to remove beneficial wild horses and burros who, unlike cattle and sheep, are an asset to the land. The BLM must stop falsely blaming beneficial wild equines for range degradation for which livestock grazing has scientifically been proven to be the true culprits of such damage on our public lands. The BLM must re-evaluate the AMLs to accommodate the present population of wild horses and make forage adjustments, pursuant to CFR 43 C.F.R. 4710.5(a). The BLM is managing wild equines at unsustainable population levels and if this continues they will be managed to extinction. At best, a mere 20,000-35,000 free-roaming wild horses and 4,000 wild burros remain on the western range according to independent, unbiased surveys - NOT the nearly 100,000 wild equines the BLM falsely claims are "breeding like rabbits". The National Academy of Sciences (NAS) in its scathing 2013 report of the BLM's Wild Horse and Burro Program stated they found NO OVERPOPULATION of wild equines and the BLM's method of "guesstimating" wild equine herd numbers as NOT SCIENTIFIC and highly suspect. In fact, wild equines have been minimized on our western ranges being given less than 16% of forage on less than 12% of public lands as the DOI consistently favors money-making enterprises over the welfare of a protected species yet it is our wild horses and burros who are scapegoated for the failure of federal land managers to hold profit driven and massively subsidized industries accountable for the damage THEY have done to our public lands. Additionally, reducing the unique Onaqui wild horse herds by nearly 75% would fly in the face of multiple-use by negatively impacting the recreational use of this public land area to the detriment of wild horse watchers who visit the area specifically to view or photograph these cherished mustangs. Furthermore, the precariously low AML of 121 mustangs does NOT constitute the carrying capacity for the wild horses in the Onaqui HMA but rather the number the BLM arbitrarily allows to exist in this herd area where authorized livestock grazing has been elevated by the agency as the principal users of this legal wild horse habitat. This violates the Wild Free-Roaming Horses and Burros Act which declares that wild equine herd areas are to be "devoted principally but not necessarily exclusively to their welfare in keeping with the multiple-use management concept for the public lands". The BLM consistently ignores this mandate for the benefit of special interests. To comply with the law, the BLM must vastly reduce, if not entirely eliminate, the overpopulation of invasive livestock to ensure that the Onaqui wild horses are given their fair share of available forage and living space. In fact, once the feral livestock is removed, the AML must be raised to the sustainable levels recommended by BLM's genetic expert Gus Cothran to ensure genetic health and viability of wild equine herds. Cothran advises a bare minimum of 150-200 animals, of whom 100 must be adult breeders. Of those 100, approximately 50 mustangs (or burros) would comprise the genetic effective population size, stating 50 as the minimum number. Of course, a much higher number would greatly decrease the chances of inbreeding among the herd, minimizing the probability of extinction. Skewing ratios favoring males would also call for a higher population number. The NAS stated in its report, "The Cothran studies are excellent tools for BLM to use in managing herds to reduce the incidence of inbreeding", a statement that failed to support the BLM's policy of managing wild equines at nonviable levels. It seems foolish for the BLM to ignore the findings of a report the agency itself requested at a cost of $2 million simply because they do not like the results. There are many tools in the toolbox that the BLM has at its disposal - humane alternatives to roundups and removals that do not involve the decimation of a federally protected species. * Along with a moratorium on roundups and removals, the BLM must stop chemically and/or surgically sterilizing our remaining wild herds in its attempt to maintain population levels below genetic viability -- a recipe for extinction. * Instead, the BLM must seriously analyze natural management methods such as encouraging self-regulation among the herd resulting in a balance of birth and mortality. The BLM cannot improve on nature, which when left alone can take care of itself. * To help in achieving self-stabilizing herds, predator protection is key. Eliminating natural predators throws the ecosystem out of whack, even contributing to population growth of mustangs which provides BLM with incentive to call for the removal of so-called "excess" wild horses -- a problem that this

			agency itself creates by allowing indiscriminate hunting of mountain lions. Contrary to BLM claims, wild horses do, in fact, have natural predators (mountain lions) that help keep their populations in check. Where there are large herbivores, there must be a top predator to maintain ecosystem health and keep prey species from overpopulating. A policy must be established to promote the protection of predator species in an effort to restore natural population control mechanisms and restore the “thriving natural ecological balance” in the area. The BLM must eliminate hunting of mountain lions to allow these predators to do their jobs so artificial, invasive management techniques in this wild horse habitat will become obsolete. * Another humane and necessary alternative is returning the 22.2 million acres that the DOI has systematically and illegally STOLEN from wild equines AND ZEROED OUT (land grabs). The 60,000 or so captive wild equines languishing in short- and long-term holding facilities could be relocated back on the range where they belong at no cost to the taxpayer. Regarding the Onaqui wild horses, the BLM should restore Herd Area territory to active management status, increasing the size of the HMA to the 507,681 acres originally designated by Congress. * The historic and irreplaceable Onaqui wild horse herds are a popular and accessible herd who are an asset to the area and are highly valued by Americans and tourists alike, therefore, it is ironic that Utah continues to promote wild horse viewing as a way to attract visitors to the state knowing full well that these living symbols of freedom and the American West are being systematically wiped out to the point where there soon there will be virtually no wild free-roaming mustangs left to view. How deceptive for a state to amass tourism money under false pretenses such as the promise of experiencing the sight of an animal that is in the process of being eradicated. Obviously, you must realize that tourists wouldn’t spend a dime for the “privilege” of gawking at a bunch of cows (welfare livestock) or oil wells. In fact, if the truth came out, the majority of Americans would probably choose to BOYCOTT Utah, as I have, rather than pour their tourist dollars into a state that is actively orchestrating the annihilation of OUR national heritage to pacify a small minority of special interests who seek the eradication of wild equines, who belong to ALL OF US. It would benefit the state to take advantage of the close proximity of these mustangs to Salt Lake City to promote wild horse viewing and photography opportunities for visitors to the area which in turn will provide economic benefits for the local community. It would be to the benefit of all -- including the wild horses -- to designate the Onaqui HMA as National Wild Horse Range. Wild horses and burros legally and rightfully belong on the western landscape "as an integral part of the natural system of the public lands" and the BLM must fulfill its legal mandate to PROTECT and PRESERVE this heritage species for future generations by ceasing any plans to “manage” our wild herds - including the Onaqui mustangs - into extinction. This includes the current plan to shoot and kill thousands upon thousands of healthy wild equines and/or send them off to be slaughtered. In conclusion, I want to voice my fierce OPPOSITION to the BLM’s plan to radically decimate the federally protected wild horses herds in the legally designated Onaqui HMA. This misguided proposal would simply line up these prospective captives to be siphoned through the slaughter pipeline, a grisly fate that these majestic and highly valued beings who helped build this nation DO NOT DESERVE. As one of the 80% of the American People who adamantly OPPOSE equine slaughter and who demand the presence of OUR wild horses and burros on OUR public lands in the west, I strongly urge the BLM to cancel this proposed roundup and removal operation immediately. I, along with the majority of the American public, fully expect the BLM to seriously consider and accept ALL comments and provide an accurate and truthful account of the positions of the public who commented on this extremely important issue, as your agency is legally required to do under NEPA.
39	No	Policy / Greater Sage Grouse / Wild Horses	I’ve read that the BLM is proposing a roundup of over 325 horses form the Onaqui Herd Management Area, which is not a good idea for this wild horse herd. Taking out this many horses from a small herd would disrupt all of the horses’ family relationships and would make the herd nonviable from a genetic perspective. This is basically a die-out scenario and would effectively remove this herd from the management area. Dr. Gus Cothran, an equine geneticist, has advised that at least 150 to 200 horses should be left in this herd to ensure that it is genetically viable. I urge you not to do this roundup (and to discontinue “gathers” or roundups for all mustang herds), but to consider other options for keeping the herd population controlled. BLM should prioritize fertility control and should partner with the knowledgeable and willing volunteers with the Wild Horses of America Foundation to help with a larger population control problem that would not involve increasing the number of wild horses held captive in BLM holding facilities. I am very concerned that, according to the Trump administration’s latest BLM National Advisory Board recommendation, these horses may be killed in holding or even sent to slaughter, which should never, ever be allowed to happen. Are you absolutely sure that wild horses are the cause of any degradation in sage grouse habitat that is being observed? BLM lands are subject to OHV use, livestock grazing, resource extraction, and many uses that certainly contribute significantly to habitat degradation. Please make sure to gather information on ALL of the contributing factors and address all of them at the source, as many other uses have more severe impacts on sage grouse habitat than wild horses living in the area. Wild horses and sage grouse and other native wildlife have lived in the same areas of the West for long periods of time, but increased human use is often the cause of the recent declines in many species’ habitat and decrease in populations of wildlife. The FWS released a study in 2012 listing the primary causes for sage grouse population decline, and wild horse-related damage to their habitat was nowhere on the list. The causes of their decline were found to be energy development, habitat fragmentation through development of transmission line ROW, fire, invasive species, and commercial developments of BLM land, all of which come from human activity and disturbance, not from wild horses. Additionally, there appear to be only a few locations in the Herd Management Area where sage grouse and wild horses live in overlapping habitats – some kind of unobtrusive fencing could be used to prevent sage grouse habitat damage rather than removing the horses from their habitat. I am both an environmental scientist/advocate and a horse owner and lover, so I want the BLM to truly balance these things and be fair to all wildlife, horses and sage grouse alike. Please really delve into the causes of these kinds of problems not just in the Onaqui HMA, but on all BLM lands. Too often, private and for-profit interests are blaming native wildlife like bison, wolves, cougars, mustangs, and other “inconvenient” species for damage or other ills to lands that they want to use, when it is actually their own activity and human activity in general that is causing the problems with resources on BLM lands (especially livestock overgrazing and energy/transmission line development). Please remember your multi-use mandate and that multiple uses are only viable as long as they don’t interfere with the right of wildlife to live in its own habitat and all of the similar uses that are hamstrung by overemphasis on development uses.
40	Yes	Policy / Greater Sage Grouse / Livestock / ESR / Wild Horses	I would like to respectfully ask that you do not permanently remove 325 horses (72%) as they might be killed in holding, per the most recent recommendation of the BLM National Advisory Board. Removing these horses would be devastating to the dynamics and health of the herd, and to the people who regularly follow, observe, and visit the Onaqui Mountain Herd. Additionally, given that the future of the wild horses in holding is unknown at present, and that they might be euthanized/killed/slaughtered, I do not want to see a significant portion of the herd removed and sent to an unknown fate. Since this herd of roughly 450 individuals is comprised of at least 4 major groups, the removal of 325 horses would mean, with an equal spread, a reduction of the Onaqui Mountain Group to about 50 horses, the Simpson Springs Group to about 36 horses, the East Onaqui Group to about 17 horses, and the Erickson Pass Group to about 11 horses. While there is certainly room to debate the exact numbers, the overall point remains: Many of the groups that make up the Onaqui Mountain Herd would be at numbers that would not sustain genetic viability. I would also like to touch upon resource allocation and mention that with the 533 acres per horse these animals are in good to very good shape, even with the thousands of cattle and sheep they have to share their HMA with. The statement of overpopulation as a reason to decrease this herd, in my humble opinion, is one that needs to be revisited, especially in regards to how all the different users impact this land. In regard to the wildfire that burned part of the Onaqui range this past July, just under 38,000 acres (per Inciweb.nwcg.gov) were lost, which is about 11% of the HMA, and about 7.5% of the HA. The Davis Mountain Group of horses is the only group that is affected by this reduction in forage, and they still seem to be quite healthy. Fire-damaged range should not be a reason to reduce the number of horses, and particularly not for a reduction to those groups of horses that never visit the fire damaged part of the HMA. I am encouraged to hear that the BLM is going to try to kill off any emerging cheat grass in the burn area, and work to restore native grasses to this area. The building of a temporary fence to protect the area as it reestablishes could be a good solution. I would also like to bring up that the BLM cites the preservation of sage grouse territory as a reason for removing these horses. It seems paradoxical that the Onaqui is facing a drastic reduction in numbers in the name of sage grouse habitat protection, when the BLM/Department of the Interior just announced that 10,000,000 acres across six western states (including Utah) will not be protected as sage grouse focal areas so that mining interests can proceed. There are only a few places where wild horses and sage grouse live together in the HMA. In those places fencing can mitigate the potential harm to sage grouse in lieu of permanent removal. The U.S. Fish & Wildlife Service released a study in 2012 that did not cite wild horses as one of the top five threats to sage grouse. Instead, it cites energy development, transmission right of ways, fire, invasive species, and commercial development as the top threats. If indeed there is a trigger on the sage grouse plan that mandates going to low AML, there really needs to be a strong look at cattle and sheep as well. I am not advocating a reduction of cattle or sheep AUMs, but there are thousands of cattle on Wild Horses of America Foundation range from November through April, and thousands of sheep that get pushed along the Pony Express Road. After review of a detailed sage grouse map provided by the Utah Division of Natural Resources, it is clear that the sheep go through sage grouse areas classified as “general habitat” and “nesting and brood-rearing” areas in very dense bunches and cover a wide swath of ground. The sheep are much more prone to eating a wider variety of forage, and since they are unable to wander freely their impacts are more substantial on a more focused area. If the goal is to keep grass at least 7” tall, or higher, then it is clear that they are likely having a higher impact on the habitat around the Pony Express Road, than are the Onaqui Mountain and Simpson Springs horses that also graze there. Per the Utah Sage Grouse SRMPA, fencing off select areas to minimize the impacts of cattle, sheep and horses, implementing noise restrictions, and the reduction of traffic, may be an acceptable or even the best alternative methods of enhancing the sage grouse habitat. And lastly, I’d like to stress the importance of your focus on fertility control. Your plan to treat 60 mares in FY2018 hardly seems adequate to slow reproduction. Volunteers with groups like the Wild Horses of America Foundation are ready and able to implement a larger population control program, which would highly reduce the costs incurred by the BLM. Speaking of cost, there seems to be the position that darting horses with PZP is expensive. However, a higher cost only occurs when the BLM gathers a horse by helicopter, treats it with a primer dose, holds and feeds the horse for a few weeks, treats it with a booster dose, then returns it to the range. The cost to treat a mare in the field is the price of the dose plus the price of the dart, which is just under $30 per dose. Add to that the time and costs for the darter and observer. When a volunteer is used, there is no added cost to the BLM. Controlling horse populations in the field by darting with PZP is far more cost effective than gather and removals, where a helicopter gather averages about $1,000 per horse. I highly support no horses being removed from the range and to instead allow the contraception treatments to gain control of herd growth. While I not subscribe to a “let them run free” type wild horse advocacy, I do believe that the Onaqui range can sustain the current number of horses. With the improvement of the contraception management plan for the Onaqui herd growth on the range can be successfully and humanely controlled, and it also serve as a model that can be implemented in other HMAs in the state. PROPOSALS… Should a gather commence, I strongly suggest that the following be considered: 1. That the number of horses of removed should be far, far fewer than the “over 325” mentioned in the scoping announcement. At very minimum, high AML should be left on the range. Over 300 horses, if carefully selected, would maintain most of the integrity of the herd. 2. That helicopters will not be used. Bait trapping is generally a more humane way to gather the horses, and it may have fewer impacts on the horses’ future adoptability. Also, this will allow fewer numbers to be removed at a time, and horses that do not fit removal criteria can be released after having a less traumatic experience. 3. That a natural male/female balance is considered when deciding which horses to remove and which horses to release back the range. Do not use sex loading (too many male horses) as a method of trying to reduce the reproductive rate. Use PZP for that. 4. That any horses that are removed will be transferred to a suitable private sanctuary* in Utah, if one is available. And/or, that the BLM will work with local advocates to ensure that every horse is adopted (this should be facilitated by the slower removal of trapping), and only bring horses off the range at a rate sustained by adoptions. 5. That emphasis be placed on removing: a. Horses that are less acclimated to people, that range in areas less visited by the public, and that are in the sage grouse habitat area. This will maintain the size and viability of the groups of horses most visited by photographers and observers, and will allow for easier PZP darting. b. Horses that are younger and therefore better candidates for adoption. (Older horses may be more habituated to life on the range, and less adaptable to a new life of domesticity. Also, they will not be entering their breeding years, and will be more likely to die sooner from natural causes, which will help to naturally control the herd size.) c. Focus on Groups (as defined above) of horses, as opposed to removing an even spread across all the Groups on the range. This will help retain the genetic viability of the remaining Groups, which will retain larger numbers. Horses in high priority sage grouse habitat should be chosen first. 6. To have a plan to treat with PZP any horses released back to the range. *Private Sanctuary: Wild Horses of America is currently pursuing a few different properties in northern Utah that can be converted to use as a wild horse sanctuary. General proposals: 1. Fully (primer and booster) treat at least 80-90 mares with PZP in FY18, and plan to adjust that figure up in subsequent years as needed to gain control of herd growth. 2. Implement PZP treatment strategies such as bait/water trapping, as needed, to treat mares that are too difficult to dart remotely by rifle. 3. Implement methods to reduce the amount of off-road travel that is occurring on the range to enhance conditions for all users. 4. Reassess the current AML (121-210 horses) using the latest and best scientific practices.

41	No	Policy / Wild Horses	While I understand this is a complex situation and not easily resolved, I believe that it should be open to further discussion. There are many stakeholders in this situation, and it would seem fair and prudent to bring them together for a public or private discussion. Wild horses across the United States have become a problem of overpopulation. We all care about the horses and the environment and do not wish to see the land, other species, the ecosystems, etc adversely affected. Sadly they already are. In the case of the land the Onaqui horses inhabit, cheat grass, a non native species and introduced by humans is also a threat to the ecosystem. What we do know is that the way we are dealing with wild horses right now is not working. The current use of helicopters in round ups, the subsequent holding pens, and the argument over slaughter are all signs that there needs to be a major change in how we deal with this overpopulation problem. I ask that you please bring representatives of all sides together for further discussions and help us all find a middle ground. I recall a very ugly fight over the Legacy Highway. While I am sure many people would have liked that the road was never built, they did however find a middle ground. Please help us find a middle ground that includes respect for all life.

42	Yes	ESR / Greater Sage Grouse / Wild Horses	Whoa!! You need to slow down your plans for the wild horse gather at the Onaqui HMA and take the time to look at additional ideas and methods for killing as much cheatgrass as possible, Some of what I've written is geared more toward wild horse lovers who might read this and have absolutely no understanding of why a Horse Management Area is not being managed for horses alone. I have realized by reading the comments each time Kent Keller posts new wild horse photos on his Facebook page, that wild horse lovers have no comprehension of what is involved in multiple use management; that you have these large areas of damaged ecosystems, and to restore them you have to use a triage approach to arrive at your multiple use plan. Applying the principles of multiple use management to public lands entrusted to the care of the BLM is something the BLM was struggling with when I was an Environmental Interpretation major, with a concentration in Wildlife Biology, at Colorado State University's College of Forestry and Natural Resources (1976-1982). Sadly, it seems that has not changed. Allow me to remind you of your mission. The lands you have been assigned to manage are 'Public' lands that belong to the American people, each and every one of us, NOT to the Federal government, and the BLM has been tasked with managing these lands on our behalf, according to the wishes of the American people, NOT special interest groups like livestock ranchers, or the industrial interests of mining and energy companies. When polled, 90 percent of Americans said they want to see our wild horses living on public lands managed by the BLM and U.S. Forest Service. Americans seem to know in their gut that wild horses are worthy of our care. First, however, some recent horse history that has now been proven by Dr. Ann Forstén, who works at the Department of Zoology at the University of Helsinki, Finland, and by Dr. Michael Hofreiter, of the Department of Evolutionary Genetics at the Max Planck Institute in Leipzig, Germany. We truly are talking about the restoration of a native animal species, Equus cabella, to the American landscape, and I don't say that because of the fossil record showing that the first horses originated in North America about 4 million years ago, crossed the Bering Sea land bridge to modern day Russia, and from there they spread throughout Eurasia 2 to 3 million years ago. The Bering Land bridge was not a one way street, however. There were migrations of prehistoric horses back and forth across the Bering Sea land bridge during those millions of years, so America was not devoid of horses during that time. No, mitochondrial DNA has proven our wild horses truly are a native species. Until now, I was on the fence regarding feral horses verses native horse returned to the wild. Dr. Forstén's mitochondrial DNA profile of the Yukon horse has sent me into the native species. Using mitochondrial DNA mutation rates, Ann Forstén, was able to calculate that the modern horse we know today as Equus caballas, originated in North America about 1.7 million years ago. Thirteen thousand to 14,000 years ago, horses disappeared from North America, roughly the same time as the first appearance of the Clovis culture. Just prior to their disappearance, the last remaining horse species was the Yukon horse, Equus lambei. As Alaska's permafrost melts it has been giving up some treasures, one of which was the preserved body of a Yukon horse that still had viable mitochondrial DNA. Dr. Forstén took samples of that DNA and made a genetic profile of the Yukon horse. It turned to be virtually identical to our modern horses, Equus cabella. Dr. Furstén then submitted her findings to Dr. Hofreiter, an evolutionary geneticist at Germany's Max Planck Institute. He agreed with her findings, saying Yukon horses genetic profile falls within that of modern horses, and modern horses first developed in North America. Thirteen to 14,000 years is not a long time on the evolutionary scale, and that may explain how quickly these Equus cabala 'escapees,' and 'releasees' were able to throw off domestication, adapt, and return to the behaviors and social structure of wild horses. AN EXAMPLE of the effects of overpopulation of a single large mammal species on public parkland. During my time at Colorado State University (1976 - 1982), Rocky Mountain NP was already experiencing elk overpopulation issues. Gray wolves and grizzly bears had been eliminated from Colorado by the early settlers and the livestock ranchers who followed, leaving little incentive for the elk to move beyond the park boundaries, finding new food sources in the process. Mountain lions remain, but they alone can't kill and eat enough elk to control the population, especially when, given the choice, they seem to prefer feeding on deer. Elk are not picky eaters. They are ruminates, like cows, and they have a wide variety of microbes in their guts that allow them to digest both leafy and woody foods. Some microbes break down one dietary item well, but have little effect breaking down others. Therefore, to stay healthy, elk require a wide variety of foods throughout the year. At normal population levels during mild winters with light snow cover, elk are able to dig and find short forage plants like grasses, sedges, forbs and ferns, along with moisture loving woody shrubs like willow, cottonwood, aspen, and elderberry; a species of huckleberry and another of blueberry that grow in dryer areas are also popular. Elk even browse on coniferous species like western red cedar, Amabilis fir, and western hemlock. With the park's elk population so far above normal, the elk quickly ate through the short and medium height winter forage, forcing them to feed on tree material much earlier in the season than normal. This lack of variation in their diets caused them to start living off their stored reserves of body fat early in the season. In hard winters with deep snow packs that persisted, elk began foraging on woody tree materials much earlier than normal. Eventually, the park's elk arrived at a point where they had eaten all the woody winter forage they could reach and they began to starve. Some died. Lack of food weakened the surviving elks' immune systems and at some point, chronic wasting disease entered the Rocky Mountain NP elk population and established itself. People visiting the park after the winter's snow had melted, saw unnatural browse lines throughout the park's forested areas. Browse line height = depth of winter snow + how high the elk could reach when standing on their hind legs. The park's aspen groves, a popular, beautiful autumn visitor draw, were especially hard hit. With the arrival of Spring, woody shrubs and trees begin to bud, their seeds germinate and begin producing seedling shrubs and trees. In the case of trembling aspen, shoots and suckers on the roots of the old trees begin to grow into new trees. Rocky Mountain NP's starving elk ate all of these -- shoots, suckers, seedlings, buds, the works -- year after year after year. The oldest aspen trees and shrubs began to die. No new seedlings or shoots survived elk grazing to replace them. The damaging changes to the ecosystem gained momentum like multiple falling rows of dominoes fanning out in all directions. Trees/shrubs die --> small mammals, amphibians, birds, butterflies, other insects, and soil fauna that evolved to coexist and use the deceased tree/shrub ecosystem for cover, nesting, food, and nearby water resources, try to adapt to the new normal, leave, or die --> Moles, mice, and voles lose food sources, nesting / burrowing habitat, and protective cover, so they adapt, if possible, move elsewhere, or die --> All of those small creatures are food sources for medium size animals further up the food chain – raptors, weasels, river otters, coyotes, foxes, martins, fishers, marmots, songbirds, bobcats and lynx so the loss radiates upwards and outwards, affecting all levels of the ecosystem's food chain. Even the tree/shrub soil ecosystem of flora, fauna and microorganisms changes --> Beavers lose favored food sources and building materials – trembling aspen, cottonwood, poplar, willow – for their dams and dens --> and on it goes in all directions. Without surviving trees and shrubs to replicate themselves, grasses move in and establish themselves. The overpopulation of a single animal, elk, destroyed a complex, highly diversified forest microecosystem, leaving behind a meadow ecosystem dominated by a handful of grass species and totally lacking complex biodiversity. When I moved back to San Jose, CA in 1993, the argument over how to reduce the park's elk population had yet to be settled. Sport hunting is not allowed in National Parks. People running around with rifles, bows and arrows are not compatible with park visitors there to hike, camp, enjoy the fall foliage, and listen to bugling elk. National Parks would have to shut down during hunting season, and the financial loss of visitor entry fees would be enormous. In an out of control case like Rocky Mountain, park employees can carry out culling as a management action. Normally, in such a situation the meat would be donated to charity, but many of Rocky Mountain NP's elk are infected with chronic wasting disease, a neurological disease that is highly contagious among deer, elk, moose and reindeer, and is related to Mad Cow disease which is transmissible to humans. While no humans have become ill from the chronic wasting disease, no one is taking any chances. All elk carcasses are tested. If they have the disease their meat is not donated. Elk are game animals. Killing game animals is acceptable. Horses are not game animals. Killing horses is not acceptable. Killing horses is UN-AMERICAN. Horses and humans evolved together, developing close, mutually beneficial symbiotic relationships. For much of our history horses helped us with our daily work, gave us transportation, and entertained us. With the Amish that is still true. We associate horses with sports, we use them for recreational pursuits, we develop long-term personal friendships with them. Did you know horses grieve when they lose the human they love? Horse Lays His Head On Coffin As He Mourns The Loss Of His Human Best Friend – YouTube. https://m.youtube.com/watch?v=RI8it5tUDuYr The video above perfectly illustrates that the relationship between humans and horses is one of loving friendship. The young man who was Sereno's owner, was killed in a traffic accident. Sereno was his best friend, so his brother brought Sereno to the funeral. Sereno seemed to understand his owner was in the coffin. He walked to the truck carrying the coffin and sniffed at the coffin repeatedly. Then Sereno laid his head down on the coffin. As the family turned to lead Sereno towards the cemetery, Sereno began to whimper, and he continued to whimper all the way to the burial site. The overwhelming number of Americans see wild horses, they see beauty, they see love – mare to foal, sibling to sibling, harem mare to harem mare, bachelor bands, friendships. They see examples of horses working together as a group. When Sec. Zinke looks at our wild horses he sees dollar signs on four legs. Some things in this world are priceless beyond compare so you don't go around killing them. Horses are most definitely one of those things. Taxpayers know the upkeep of horses is expensive, but we hold horses in such high esteem that killing them for human consumption, or to make them an ingredient in pet food is just unacceptable. Period. Horses are our pets and our friends. Would you feed your cat to your dog? Your parrot or guinea pig or hamster to your cat? Anyone who would is one sick, mentally disturbed individual. Real Americans don't murder horses!! Wild horses give us a window to the prehistoric past of our country. That's why we find maintaining the excess horses in long term holding facilities preferable to killing them. Use volunteers wherever possible to cut costs? Have you ever tried a GoFundMe crowdsourcing campaign as a source of income to reduce the costs of caring for these horses? If not, please contact the Humane Society and the ASPCA for volunteer assistance in setting up a crowdsourcing fund, and making sure every horse association, veterinary teaching school, and large animal veterinarian practice in the U.S. and Canada knows about it. Another suggestion would be approaching the Girl Scouts and Boy Scouts of America to add earning a badge for caring for America's wild horses as part of their programs. Who knows, along the way some horse - kid relationships might develop that lead to new adoptions. I understand what multiple use management requires, and know the Onaqui HMA management plan cannot revolve solely around the horses, even though they truly are a native species. I do believe that a management plan can be devised to meet the needs of the Onaqui horses, but the Onaqui ecosystem must first meet the needs of big and small game, and non-game wildlife, especially the threatened sage grouse. Without the help of wolves and bears, and an inadequate population of mountain lions, it is difficult to keep populations of deer, elk, pronghorn antelope and wild horses in check and keeping their populations under control is not only necessary for an overall healthy, balanced ecosystem; it is also necessary in order to maintain the health of the various species of animals, 'wild' horses included. Removing animals from populations that have grown too large is sometimes necessary. HOW this is humanely accomplished is the heart of the Onaqui horse herd size debate. The white-tailed deer population explosion is not confined within the boundaries of a park. A headline that I saw gives you a hint of the magnitude of the white-tail problem: Too Many Deer: A Bigger Threat to Eastern Forests than Climate Change? We are talking about the forests that extend from Illinois eastward to the Atlantic Ocean. Clear back in 1949, Aldo Leopold, the father of modern wildlife biology and wildlife management techniques, commented on where he believed the whitetail population problem was headed: "I now suspect that just as a deer herd lives in mortal fear of its wolves, so does a mountain live in mortal fear of its deer." Aldo Leopold, A Sand County Almanac, 1949. This is another example of what happens when humans remove large predators from an ecosystem. The problem with Yellowstone's American Bison is a bit different. They are wandering souls, and head out of the park's boundaries regularly, which would not be such a problem were it not for the fact that many of these bison are infected with brucellosis, a highly contagious disease that has spread to Yellowstone's elk, who also move outside Park borders. Brucellosis causes livestock to abort their fetuses. There are a number of privately owned livestock ranches in the areas surrounding Yellowstone, so ranchers have a legitimate concern that this disease could spread to their breeding stock. Brucellosis can also be transferred to humans if the meat isn't cooked properly. Over the years, the BLM has seemed determined to manage America's wild horses using methods that, in direct contradiction to the wishes of 90 percent of Americans, will lead to their deaths sooner, rather than natural deaths due to illness or old age later in life. Cattle and sheep ranchers have had the BLM eating out of the palms of their hands for many decades. Regional BLM offices are charged with developing multiple use management plans for Public lands for ALL Americans, not just for grazing, mining, and fossil fuel interests. It's high time the BLM pulls itself up by the bootstraps, does the government agency version of growing a pair, and stands up to ranchers who believe they are somehow 'entitled' to use BLM lands as an extension of their private pastureland at ridiculously low permit fees that are a rip-off of American taxpayers. Ranchers are NOT so entitled. If they want to continue using Onaqui BLM land for grazing, they need to accept they will only be one part, a fraction, of your overall multiple use plan for the Onaqui HMA. The threatened Sage grouse recovery plan takes precedence over cattle and 'wild' horses, and to pull off the sage grouse recovery the BLM first needs to eliminate as much cheatgrass as possible, one of, if not the biggest cause of Onaqui HMA wildfires that have killed off the sagebrush habitat required for sage grouse to reproduce successfully. If ranchers still want to lease land, please, raise their permit fees to rates equivalent to what they would pay per acre to rent private grazing land. Ranchers, and other special interest groups need to pay their fair share. If they did, that money would be a huge help help the BLM to fund Onaqui's other management expenses. Sage grouse recovery will take years to complete. To increase the sage grouse population, you first need to kill off a substantial amount of invasive cheatgrass and other interloping plants. The Onaqui HMA's cheatgrass problem is not unique. Fifty million acres of sagebrush habitat in the American West is infested with cheatgrass. Worse, the cheatgrass brought a new fire cycle to the lands it infests. Healthy, but slow growing sagebrush ecosystems burned, on average, once every 30 to 150 years. Cheatgrass burns once every 3 to 7 years, and all it takes to start a fire is a single lightning strike. Sagebrush takes 10 years to reestablish itself and grow to a size that makes it decent sage grouse habitat. The cheatgrass fire cycle makes that impossible, so cheatgrass annihilation should be at the top of your list, followed by working to reestablish the plants commonly found in a sagebrush steppe or sagebrush shrub ecosystem. Then comes the birds. Cheatgrass doesn't die easily. "Cheatgrass roots grow when it is still cool outside, earlier in the spring than most native plants in sagebrush habitat, and they continue growing later into the fall. The cheatgrass plant produces an extensive root system that is able to take up more water and nutrients before native

plants have even started to grow. Cheatgrass then dries out by late spring or early summer and provides fuel for wildfires that clear established native plants nearby, making room for more cheatgrass to seed. Each year, the process restarts. Native plants, unable to compete and unable to withstand frequent fire, soon give way to cheatgrass monocultures." “Big sagebrush is killed by fire,” says Chuck Warner of The Nature Conservancy (TNC) in Washington. “The only way to reestablish it is by seed. Then it takes about ten years to mature and be reasonable habitat for sage grouse or pygmy rabbit. Fire intervals of 5-7 years don’t give it much of a chance.” "Traditionally, herbicide has been the primary method of removing cheatgrass and, though some herbicides can be effective against cheatgrass, they only take out the grown plants, leaving seeds in the soil that will grow and need to be sprayed the following year." (All quotes from : Attacking Invasive Cheatgrass at Its Root. Feldkamp, Lisa. 7 Sep. 2016. https://blog.nature.org/science/2016/09/07/attacking-invasive-cheatgrass-root-soil-microbes-biocontrol-sage/ The problem with chemical herbicides is their toxicity to birds and animals. Even though it looks like the above ground portion of the cheatgrass plant is dead and gone, the "extensive cheatgrass root system" mentioned above, extends about three feet down into the soil. New techniques developed by Nature Conservancy researcher Ann Kennedy, using a specific soil micro bacterium (D7) that exists naturally in the soil, has been shown to inhibit and eventually kill cheatgrass root systems. She literally took soil samples collected from sagebrush ecosystems invaded by cheatgrass in Washington state, isolated out 25,000 different soil micro bacteria from those samples (obviously she had help from a team working with her). One by one, they grew artificially high concentrates of each, then tested the effect of each micro bacterium on cheatgrass roots. She found one that inhibited cheatgrass root growth and after several seasons killed the roots and the attached plant entirely. D7 is species specific, affecting only cheatgrass, so when the cheatgrass roots die, the bacteria die too. Native plants that belong in the ecosystem are not affected, and the wild animals who use the area won't be harmed if they eat the cheatgrass. This also means you can begin the reseeding process at the same time you are spraying the cheatgrass. To be effective, application to the soil requires specific timing during the year -- usually October or November-- and specific weather conditions -- rain arriving within a few days after spraying -- and it may need to be repeated several years in a row. Ann Kennedy: “We have this cold loving organism that we have to be careful that we don’t put it on when the predators from the microbial community would eat it up.” “It’s like the food web even at the microbial level. There are some paramecium and protozoa that would just as soon eat the microbial community as look at it.” The challenge for scientists is to go from producing enough of the live bacterial herbicide spray to cover relatively small areas of cheatgrass, to producing quantities large enough to spray 20,000 to 50,000 acres from a plane. Ann Kennedy has not stopped with D7. She found an effective fungal herbicide, too. An effective anti-cheatgrass fungus was found by another team of researchers as well. The abstract to their research paper is below. Cheating Cheatgrass: New Research to Combat a Wily Invasive Weed, Fire Science Digest, Joint Fire Science Program, May 2012, Issue 13. Cheatgrass and its cousin, red brome, are exotic annual grasses that have invaded and altered ecosystem dynamics in more than 41 million acres of desert shrublands between the Rockies and the Cascade-Sierra chain. A fungus naturally associated with these Bromus species has been found lethal to the plants’ soil-banked dormant seeds. Supported by the Joint Fire Science Program (JFSP), researchers Susan Meyer, Phil Allen, and Julie Beckstead cultured this fungus, Pyrenophora semeniperda, in the laboratory and developed an experimental eld application that, in some trials, killed all the dormant soil-banked Bromus seeds, leaving none to germinate the following year. The team’s work opens the way to a commercial biocontrol product that may be capable of safely eliminating the seed bank of persistent invasive grasses. Biocontrol could be used in conjunction with other weed control measures and conservation strategies to make sagebrush-steppe lands less susceptible to reinvasion. A biocontrol tool effective against Bromus seeds would be a boon to managers working to restore the native bunchgrasses, forbs, and shrubs that characterize an intact shrub-steppe ecosystem. And then there is the reseeding. A new process has been devised that gives sagebrush seeds a 70 percent better chance of survival. Have you heard of the Pasta Maker Method? If you have not, I am not kidding. Soil and other goodies to help seeds survive the elements, germinate successfully, and grow into hardy, strong plants, are put into a pasta machine which works the mixture into what I'd call a very earthy 'dough.' From this, 'dough' hardened seed pellets are made that resemble raviolis and are easily spread. Brilliant! Hats off to whomever envisioned a pasta maker rescuing America's sagebrush ecosystems. It is ‘Head Start’ for Sagebrush. Gardener that I used to be before falling off a ladder and damaging my spine and spinal cord, and having grown up on a fruit orchard ranch, I have wondered about a couple of things. Can you transplant sagebrush or propagate it through stem cuttings? I found one article that seems to indicate that you can propagate sagebrush by taking stem cuttings from the most recent growth, rooting them, then transferring them to soil in a pot, or transplant directly at Onaqui. No way am I thinking of this as an alternative to reseeding, BUT if you pick some smaller spots to start eliminating cheatgrass at Onaqui, it could provide you with a bit of sagebrush diversity in terms of size and stages of development. If you do know of places that have healthy, robust sagebrush ecosystems, could you, with a little interagency cooperation and volunteer assistance university student volunteers from rangeland science and botany programs, see if stem propagation is possible, and if it is, find places where sagebrush is still doing well and visit those places once the weather turns colder, and do a combination of cutting stems from the current year’s growth, and here and there so you don't damage a healthy ecosystem, dig up entire bushes of various sizes, and transplant them at Onaqui. Considering the state of things in Washington D.C., I think it is going to be a few years before we can right the sinking ship, so interagency cooperation and finding volunteers to help cut costs is probably going to be the only way to get things done. The wild horses of today are all direct descendants of the first Equus caballa that originated here in North America 1.7 million years ago, as are all the breeds who returned to North America as domesticated animals. The prehistoric ancestors of both the domesticated horses brought to the Americas by Spanish explorers, and later by European immigrants, and the wild horses of today are virtually indistinguishable genetically from the last prehistoric horse, the Yukon horse, that disappeared from North America about 13,000 years ago. The Bering Sea land bridge was a two-way street. The Spanish conquistadors called their escaped horses 'mestengos,' which translates to 'strays.' On the dignity scale, 'Mustang' is a definite name upgrade. Onaqui horses who show a strong genetic decendendancy from the original Spanish horses can legitimately be called Mustangs. Genetically, our wild horses are a blending of breeds, literally the Heinz 57s of horses, and and that is what makes them so special. Like their blended breed canine counterparts, their diverse genetic history and natural selection has made for horses that are stronger, more compact in size, that have more stamina, are more alert and aware of their surroundings; have developed lower leg bones and joints that don't break or dislocate as easily as in purebreed horses; are healthier, more sure-footed, and smarter than purebreed horses. And after nearly a year of examining Kent Kellers photographs, the only word I can think of to describe the Onoqui stallions' musculature is, well, RIPPED! They are a glorious American survival story, a direct genetic line back to the world's first Equids that appeared right here in North America 4 million years ago; they are virtually identical genetically to our native, North American prehistoric Yukon horse (Equus lambei), so they are the direct descendants of an American Native horse, as are all the breeds that came here from Europe, Arabia and Asia. Today's American wild horses are the heroes of the equine world. Americans don't send our dogs to slaughter. Americans don't send our cats to slaughter. Americans don't send our parrots to slaughter, or our native non-game wildlife, which is what these horses are. And there are strict rules on how many game animals we can kill at any one time. Americans don't want these horses slaughtered for their meat. These are OUR horses. Don't believe me? Put it on a ballot! The vast majority of Americans revere horses and value them highly, to an extent not appreciated, let alone understood by Secretary Zinke. And it's not a party line issue. Trump's favorability rating is 35 percent. Wild horses favorability stands at 90 percent. America would not be what it is without the horse. Their more recent ancestors were the survivors of long, Hellish crossings of the Atlantic in the cargo holds of galleons. Many horses died during those voyages. They provided transportation for the Colonists and carried their Colonial owners as they began to relocate farther west into the wilderness. Horses transformed the lives of many First Nation tribes. They could cover larger distances while hunting, and horses took much of the work out of pulling a travois across the plains. The horse spirit has enormous power, has become a Totem and Power Animal. To get across the Rocky Mountains, Lewis and Clark had to buy horses from the Shoshone. Cavalry horses carried soldiers into battle from Colonial times to the end of WW1, and in many of our cities, horses still carry police officers through their workdays, especially when crowd control is needed. When gold was discovered in California, some horses carried family members across the Oregon Trail while others teamed up to pull some of the Conestoga wagons. Horses powered our ancestors' plows, breaking the soil so crops could be planted to feed their families, and sell for income. My Missouri grandparents used a horse drawn plow well into the 1930s. They walked in endless circles, powering millstones to grind wheat seeds into flower, and dried corn kernels into cornmeal. They packed loads too awkward or heavy for men, and pulled massive tree trunks from forest to cutting mills so homes could be built. The Pony Express delivered the mail, keeping widely scattered family members in touch, and horses teamed up to pull the stagecoaches that delivered people from one place to another. When I was a kid, I didn't know any girl who didn't dream of having a horse of her very own someday. Horses have dressed up pretty to entertain us at the circus and seriously blinged themselves out for parade appearances. And how would the careers of John Wayne and Roy Rogers have gone without horses? John Wayne was over 6-ft 4-in tall and late in his career he had grown so heavy that the proportion of man to horse didn't strike me as being in the horse's favor, and always left me feeling sorry for the horse. Roy Rogers horse Trigger, was part of his act. He loved Trigger so much that when Trigger died, Mr. Rogers sent him to a taxidermist and had him stuffed. A tad extreme in my opinion. Horses have been therapy animals for special needs kids and adults, and a source of solace for recently returned veterans, injured in mind or body. At Arlington National Cemetery, horses have been given the honor of pulling the caissons carrying a soldier's casket to its final resting place. The caisson may be followed by a riderless horse, with the boots facing backwards in the stirrups. Horses have done so much for America. They have been honored for all they have contributed and we are going repay all they have done for this country by sending their genetic equals, same genus, same species, all descendants of, and genetic equals to the prehistoric Yukon natives of this country, to be murdered so they can be fed cats and dogs? How can the BLM so disrespect these cousins who either found their way to freedom, or had it thrust upon them by their owners for unknown reasons, by sending these magnificent creatures to be slaughtered? If, after working out the complexities of a multiple use management plan, there is room to run a limited number of cattle or sheep, fine, but according to the wishes of the American people whose taxes pay your salaries, managing the land for wild horse usage takes priority over cattle and sheep because of the Federal laws passed that protect what we now know are native wild horses. In 1959, Americans felt so strongly against horses being slaughtered that Congress passed The Wild Horse "Annie" Act during the Republican administration of General Dwight Eisenhower. In 1971, that law was reinforced by The Wild Free-Roaming Horses and Burros Act (WFRHBA), signed into law during the Republican administration of Richard Nixon. WFRHBA extended protection to wild horses and donkeys living on federal lands, and placed these animals in the care of the Bureau of Land Management (BLM) and U.S. Forest Service (USFS). The BLM and USFS were told they were to manage, PROTECT, and study the "unbranded and unclaimed horses and burros on public lands in the United States." Twenty-twenty hindsight, big mistake in my opinion. This responsibility should have been given to wildlife biologists who are trained to do accurate counts of large game animals, techniques that can be transferred to large non-game animals which is what wild horses are, and spend their careers protecting wild animals from the public, and sometimes protecting the public from certain wild animals, and studying the interactions of animals with their ecosystems and with other wildlife in those ecosystems. Do you honestly know the number of horses in the Onaqui herd? I have encountered so many comments by people saying that there is no way the herd has grown to 450 horses. Have you ever done a count when you have taken a helicopter up on a day with an even cover of snow. Go to a higher altitude so as not to upset the horses. Most of the herd, with the possible exception of the creamellos, should show up well against the snow. And about the creamellos. Did you know that the only draft horse ever bred in the U.S. is called the American Cream. I saw a photos of the American Creams used at Williamsberg Living History Park and they looked nearly identical to the Onaqui herd. The breed is nearly extinct. BLM land managers need to find a way to stand with the 90 percent of Americans who, when asked, say they want to see Native wild horse herds preserved without any horses being physically harmed in the process. If BLM and USFS employees from all over the US come together as a unit, that gives you additional power to resist sending horses to slaughter. Using back channels, quietly signal to groups like the Humane Society, the ASPCA, and organizations that support our native wild horses, that you BLMers and USFSers will find ways to support their efforts if they decide to file lawsuits against the Federal government. It is amazing what a little leaked information can accomplish. See if you can enlist the support of Saturday Night Live to take on Sec. Zinke, Donald Trump, and Congressional Republicans by doing a series of sketches about sending our beautiful, native wild horses to be slaughtered. It's not the horses fault that past management practices have failed them. Now that PZP is showing strong evidence of keeping other wild horse herds' populations in check, Sec. Zinke has ordered you to stop using it on the Onaqui herd after only one year?!! Because it is too expensive!!! Really? Zinke clearly took too many hits to his brain during his football years because his orders don't even begin to make sense. My research showed that in 2011-2012, PVP was being made in Billings, Montana and that a single dose of PVP cost $24. The BLM claimed each inoculation cost $2,600 in an article I read. Well, if you insist on having a gather that costs millions, what with the cost of helicopters, helicopter fuel, pilots' salaries, veterinarian care, fodder for the gathered horses, and transportation costs to send the wild horses to long-term holding facilities and long- term care of these horses, it really does run up the cost per horse. Please continue inoculating the mares with PVP. Remember my suggestion for a GoFundMe crowdsourcing account? Here is another area where it could help bring your costs down. Follow the lead of other HMAs and use volunteers trained to prepare darts, and trained to use a dart gun, who is blessed with extraordinary patience, and pair them with someone who has experience tracking animals, and who can distract the mare so she doesn't see the person with the dart gun. Reach out to veterinarians in large animal practices who also treat wild animals. A Dr. Michelle Oakley type veterinarian. I wish someone would create a silent dart gun. Sage grouse recovery will take years to complete. To increase the sage grouse population, you first need to kill off a substantial amount of invasive cheatgrass and other interloping plants. The Onaqui HMA's cheatgrass problem is not unique. Fifty million acres of sagebrush habitat in the American West is infested with cheatgrass. Worse, the cheatgrass

			brought a new fire cycle to the lands it infests. Healthy, but slow growing sagebrush ecosystems burned, on average, once every 30 to 150 years. Cheatgrass burns once every 3 to 7 years, and all it takes to start a fire is a single lightning strike. Sagebrush takes 10 years to reestablish itself and grow to a size that makes it decent sage grouse habitat. The cheatgrass fire cycle makes that impossible, so cheatgrass annihilation should be at the top of your list, followed by working to reestablish the plants commonly found in a sagebrush steppe or sagebrush shrub ecosystem. Then comes the birds. Cheatgrass doesn't die easily. "Cheatgrass roots grow when it is still cool outside, earlier in the spring than most native plants in sagebrush habitat, and they continue growing later into the fall. The cheatgrass plant produces an extensive root system that is able to take up more water and nutrients before native plants have even started to grow. Cheatgrass then dries out by late spring or early summer and provides fuel for wildfires that clear established native plants nearby, making room for more cheatgrass to seed. Each year, the process restarts. Native plants, unable to compete and unable to withstand frequent fire, soon give way to cheatgrass monocultures." “Big sagebrush is killed by fire,” says Chuck Warner of The Nature Conservancy (TNC) in Washington. “The only way to reestablish it is by seed. Then it takes about ten years to mature and be reasonable habitat for sage grouse or pygmy rabbit. Fire intervals of 5-7 years don’t give it much of a chance.” "Traditionally, herbicide has been the primary method of removing cheatgrass and, though some herbicides can be effective against cheatgrass, they only take out the grown plants, leaving seeds in the soil that will grow and need to be sprayed the following year." (All quotes from: Attacking Invasive Cheatgrass at Its Root. Feldkamp, Lisa. 7 Sep. 2016. https://blog.nature.org/science/2016/09/07/attacking-invasive-cheatgrass-root-soil-microbes-biocontrol-sage/ The problem with chemical herbicides is their toxicity to birds and animals. Even though it looks like the above ground portion of the cheatgrass plant is dead and gone, the "extensive cheatgrass root system" mentioned above, extends about three feet down into the soil. New techniques developed by Nature Conservancy researcher Ann Kennedy, using a specific soil micro bacterium (D7) that exists naturally in the soil, has been shown to inhibit and eventually kill cheatgrass root systems. She literally took soil samples collected from sagebrush ecosystems invaded by cheatgrass in Washington state, isolated out 25,000 different soil micro bacteria from those samples (obviously she had help from a team working with her). One by one, they grew artificially high concentrates of each, then tested the effect of each micro bacterium on cheatgrass roots. She found one that inhibited cheatgrass root growth and after several seasons killed the roots and the attached plant entirely. D7 is species specific, affecting only cheatgrass, so when the cheatgrass roots die, the bacteria die too. Native plants that belong in the ecosystem are not affected, and the wild animals who use the area won't be harmed if they eat the cheatgrass. This also means you can begin the reseeding process at the same time you are spraying the cheatgrass. To be effective, application to the soil requires specific timing during the year -- usually October or November-- and specific weather conditions -- rain arriving within a few days after spraying -- and it may need to be repeated several years in a row. Ann Kennedy: “We have this cold loving organism that we have to be careful that we don’t put it on when the predators from the microbial community would eat it up.” “It’s like the food web even at the microbial level. There are some paramecium and protozoa that would just as soon eat the microbial community as look at it.” The challenge for scientists is to go from producing enough of the live bacterial herbicide spray to cover relatively small areas of cheatgrass, to producing quantities large enough to spray 20,000 to 50,000 acres from a plane. Ann Kennedy has not stopped with D7. She found an effective fungal herbicide, too. An effective anti-cheatgrass fungus was found by another team of researchers as well. The abstract to their research paper is below. Cheating Cheatgrass: New Research to Combat a Wily Invasive Weed, Fire Science Digest, Joint Fire Science Program, May 2012, Issue 13. Cheatgrass and its cousin, red brome, are exotic annual grasses that have invaded and altered ecosystem dynamics in more than 41 million acres of desert shrublands between the Rockies and the Cascade-Sierra chain. A fungus naturally associated with these Bromus species has been found lethal to the plants’ soil-banked dormant seeds. Supported by the Joint Fire Science Program (JFSP), researchers Susan Meyer, Phil Allen, and Julie Beckstead cultured this fungus, Pyrenophora semeniperda, in the laboratory and developed an experimental eld application that, in some trials, killed all the dormant soil-banked Bromus seeds, leaving none to germinate the following year. The team’s work opens the way to a commercial biocontrol product that may be capable of safely eliminating the seed bank of persistent invasive grasses. Biocontrol could be used in conjunction with other weed control measures and conservation strategies to make sagebrush-steppe lands less susceptible to reinvasion. A biocontrol tool effective against Bromus seeds would be a boon to managers working to restore the native bunchgrasses, forbs, and shrubs that characterize an intact shrub-steppe ecosystem. And then there is the reseeding. A new process has been devised that gives sagebrush seeds a 70 percent better chance of survival. Have you heard of the Pasta Maker Method? If you have not, I’m serious. Soil and other goodies to help seeds survive the elements, germinate successfully, and grow into hardy, strong plants, are put into a pasta machine which works the mixture into what I'd call a very earthy 'dough.' From this, 'dough' hardened seed pellets are made that resemble raviolis and are easily spread. Brilliant! Hats off to whomever envisioned a pasta maker rescuing America's sagebrush ecosystems. It's Head Start for Sagebrush. Gardener that I used to be before falling off a ladder and damaging my spine and spinal cord, and having grown up on a fruit orchard ranch, I have wondered about a couple of things. Can you transplant sagebrush or propagate it through stem cuttings? I found one article that seems to indicate that you can propagate sagebrush by taking stem cuttings from the most recent growth, rooting them, then transferring them to soil in a pot, or transplant directly at Onaqui. No way am I thinking of this as an alternative to reseeding, BUT if you pick some smaller spots to start eliminating cheatgrass at Onaqui, it could provide you with a bit of sagebrush diversity in terms of size and stages of development. If you do know of places that have healthy, robust sagebrush ecosystems, could you, with a little interagency cooperation and university student volunteers from rangeland science and botany programs, see if stem propagation is possible, and if it is, find places where sagebrush is still doing well and visit those places once the weather turns colder, and do a combination of cutting stems from the current year’s growth, and here and there so you don't damage a healthy ecosystem, dig up entire bushes of various sizes, and transplant them at Onaqui. Considering the state of things in Washington D.C., I think it is going to be a few years before we can right the sinking ship, so interagency cooperation and finding volunteers to help cut costs is probably going to be the only way to get things don. Sage grouse recovery will take years to complete. To increase the sage grouse population, you first need to kill off a substantial amount of invasive cheatgrass and other interloping plants. The Onaqui HMA's cheatgrass problem is not unique. Fifty million acres of sagebrush habitat in the American West is infested with cheatgrass. Worse, the cheatgrass brought a new fire cycle to the lands it infests. Healthy, but slow growing sagebrush ecosystems burned, on average, once every 30 to 150 years. Cheatgrass burns once every 3 to 7 years, and all it takes to start a fire is a single lightning strike. Sagebrush takes 10 years to reestablish itself and grow to a size that makes it decent sage grouse habitat. The cheatgrass fire cycle makes that impossible, so cheatgrass annihilation should be at the top of your list, followed by working to reestablish the plants commonly found in a sagebrush steppe or sagebrush shrub ecosystem. Then comes the birds. Cheatgrass doesn't die easily. "Cheatgrass roots grow when it is still cool outside, earlier in the spring than most native plants in sagebrush habitat, and they continue growing later into the fall. 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It would be welcome news if you could reassure wild horse lovers around the world, that the BLM is actively implementing humane solutions to reduce wild horse populations, limit future herd growth to numbers the various HMA ecosystems can sustain, and you hope that will end the need for wild horse gathers, which breaks down the familial structure of wild horse bands (typically a band stallion, a lead mare, several other harem mares, bachelor stallions under 2 years of age, and foals, and sends the excess horses that have always known freedom to permanent holding facilities, causing unnatural levels of stress and physical suffering for the horses. If you absolutely, positively, have to do this gather, is there any way you could just remove 100 horses this time? One hundred next year and so on, and pease try to keep the members of the familial bands of the wild horse bands together. It will keep the horses calmer, and with horses, the less stress the better. And as you sort the bands out, please try to keep the band stallions with his herd mare. Give a couple of his mares PVP. And if they happen to have really young foals, keep mom and baby together so the foal gets a healthy start in life nursing from his mom. You do realize that the herd you have chosen to gather has a huge international following of Kent Keller fans. Many of the horses have names and are easily recognized on sHe has an unbelievable eye for detail that enables him to enrich his photographs with details other photographers just don’t have the eye to work into their pictures – ripples in water, reflections in water, a huge shot of the moon at night behind horses, a magnificent stallion emerging out of a cloud of dust, cloud formations combined with sunrises and sunsets, rainbows. He loves these animals and seems to spend one or two days almost every week out photographing the Onaqui herd. He is a self-taught naturalist. Probably capable of identifying which horses belong in the specific band better than most. I have gone back over his Facebook postings and the most horses he has mentioned

			seeing at any one time was about 200. He also completed his 41st year of his banding of and studying Golden eagles. I think it is the longest continuous study in North America. Education, education, education for wild horse lovers: 1. They need to understand the method called multiple use management and how it works, especially since it is also the management method used by the US Forest Service, the US Fish and Wildlife Service and individual State fish and wildlife agencies, National Wildlife Refuges; by City, County, State, and National Parks; and land considered so critical to keeping an ecosystem whole or to preserve adequate open space for future generations, that they are purchased by organizations like The Nature Conservancy. 2. They need to understand what sagebrush steppe and sagebrush shrub ecosystems are and the variety of animals that are part of the ecosystem. Somewhere I read that healthy sagebrush ecosystems support about 350 different wildlife species. 3. Why 'threatened' and 'endangered' species and the restoration and/or maintenance of the ecosystems they need to survive top the management priority list in the Onaqui case, wild horses. 4. Why restoring sagebrush steppe and sagebrush shrub habitats to save the sage grouse will also benefit wild horses and game animals -- mule deer, pronghorn, ¿desert bighorn sheep?, and ¿elk? -- and non-game animals on these lands. 5. What is cheatgrass, where did it come from, and how did it get here? How did it spread so quickly? Why is it so hard to get rid of and why does doing so take so long? 6. How does an invasive plant outcompete native plants thus depriving native reptiles, amphibians, songbirds, insects, game and non-game species of animals, of the food, water, and cover essential for their survival. Can Sage Grouse be double-clutched to get them to lay 2 sets of eggs annually. It was a popular technique used to enlarge the populations of certain raptor species back in the 1970s. When the hen lays her first clutch of eggs you watch until she leaves the nest, then swoop in and take the eggs and put them in the incubator. With some bird species, this will stimulate them to lay a second clutch. Mama Sage Grouse raises the second clutch of eggs. And you raise the first clutch. They managed to do this with California Condor chicks. The chicks never saw the faces of the people feeding and taking care of them so they didn't imprint on their humans. Hanford, Washington's sagebrush reestablishment involved pygmy rabbits. They created an outdoor predator-proof pen for the rabbits to help them adapt to what their home will be like when they are released. Are there any mountain lions at Onaqui? If not, the next time one wanders into a residential neighborhood and you have to relocate it, why not a Onaqui? How many mountain lion ranges would fit on Onaqui? Two? Three? Four? Don't tell ranchers. There is a prison program in Cañon City, Colorado where certain prisoners are allowed to work with the wild horses. Is that the only program like that in the country? If so, could you get some others up and running to gentle the horses, and turn them into good riding horses that would bring you more money. And I wasn't kidding when I suggested starting a crowdfunding account to bring in as much money as you can to help offset costs. Pair horses with wounded soldiers to see if the horses can give their soldier extra encouragement and soldiers can give the horses a lot of TLC. Teaching Boy and Girl Scouts to gentle the horses. Pair horses with soldiers who are depressed or have PTSD to see if that helps them to deal with the PTSD. Wild horses would make better pack horses because they are more sure footed because they have never worn shoes. See if any ranchers would be interested in breeding one of the wild stallions to their mares. Breed stallions to working ranch horses to improve. Burros to help protect herds of sheep, alpacas, goats. "THE COMING GENERATIONS WILL HAVE GOOD REASON TO CALL US UNFAITHFUL STEWARDS IF WHEN WE ARE GONE THERE ARE NO LONGER LITTLE HORSES ON THE EXMOOR HILLS." MARY ETHERINGTON (1947)
43	No	ESR / Greater Sage Grouse / Wild Horses	Wildfire problems I would like there to be consideration of fencing erected in the area devastated by the wild fire. This could be a temporary management solution, which would be effective as the native grasses (which I believe are to be seeded there) start to take hold and re-establish. This makes sense and would ensure the re-establishment of the native grasses, without the need to remove any horses in the area. I understand that there is only one group of horses which frequent this area; the Davis Mountain group. If necessary their movements, along with other livestock and wildlife, could be controlled using water sources to draw them to other areas. However with fencing protecting the delicate areas, there should be no need for this additional solution. Summary: Wild fire burn areas should not be the reason to remove horses from this area, or to reduce the horses in the area. Note: I understand that wild horses can eat the cheatgrass (as a major contributor to fire) before it seeds, and basically having a different habit and consummation style to other animals could be major contributors in preventing wild fire. It would be interesting to consider whether in fact the presence of more horses in the particular area that was damaged by wildfire, could have prevented it starting in the first place. An interesting thought! Sage Grouse I've been doing as much research on sage grouse as I can, although I feel I need months to read and get to grips with many of the relevant studies and research papers. I like to be as informed as possible, and have done my best to be so before commenting on this proposed gather. As I understand it, there are only a few places wild horses and sage grouse live together in the HMAs generally, and I would like to propose that fencing could be part or whole of the resolution. If necessary the fences can be marked (as I believe the sage grouse do not like fencing or that they damage themselves with fencing). I have spoken with one of the photographers who regularly visits the Onaqui herd, Kelly Jay, and she has doesn't recall ever having seen one sage grouse over a 12 year period. I am not quite sure what this means; one interpretation could be that some of the area is not frequented by sage grouse, and so the wild horses and the sage grouse do not actually "live together" as such. Perhaps the various groups of horses do or do not, and indeed this could be monitored for further information. If certain groups spend time in sage grouse habitats, then these groups should be the focus of thought. I have looked at the BLM map "Onaqui Mountains wild horse and burro areas with sage grouse habitat". Having read articles regarding the sage grouse, it appears they are closer to Sheeprock. Not many horses range in that area. Reading that 99% of leks are in areas with less than 3% development suggests that there are many more pieces of the pie to look at, rather than remove horses, which to me appears a drastic action when already the numbers are not that high in the Onaqui area (although I appreciate the AML). I also have concerns that interested groups such as the Sierra Club and others prefer the sage grouse numbers to be high enough to be "harvestable" and that should not be something that should affect the wild horses. I understand that the BLM made the decision recently to not protect sage grouse focal areas in six Western States (including Utah) because of mining interests. This is the choice of the Department of the Interior and it is a concern to me that wild horses may now suffer because a decision has been made to support the sage grouse in a particular area of Utah instead. Finally, livestock do need to be looked at, this can't be avoided. ~This area appears to be complex, as to whether grazing etc helps or hinders, depending on the time of year, type of digestion and other factors. However certainly there must be times when livestock could be kept to certain parts of the area or perhaps not put to graze in certain times of year which it is known would affect the sage grouse habitats most negatively. Summary: It appears that the Onaqui herds are facing partial removal, when the majority (or possibly more) are not affecting sage grouse habitat. Other areas which could have been adopted by the Department of the Interior for sage grouse habitat areas were not chosen, due to mining interests. All other interests should be considered and actions weighed up before any horse removal. There should preferably be no removals. Removal should not be done because of mining interests having a "better vote"; that is a little like using wild horses a last resort, with just about everything else being put before their needs. PZP (horse fertility control) I understand that the Onaqui herd has been treated with this, but the numbers of treated mares is very low. I would like to see the numbers raised so that the contraception has a chance to work properly. The goal for Fiscal year 2018 is around 60 mares, but this needs to be raised so that the controls have a good chance of succeeding and it would be sensible to increase this number if possible. I do not know whether some groups are more difficult to treat than others, whether some are skittish, but it may be worth considering an equine behaviourist specialist from a reputable organisation such as the IAABC to help with advice. For example horses like any animal can habituate or desensitise to situations. Behavioural specialists can give advice as to how to use horse ethology, learning theory including classical conditioning, for example, to help with using PZP if there are problems with getting close enough. Horse darting with pzp is cheaper in the field, so ideally it should be done there, and again ideally with money invested to this end. Ultimately this will be cheaper than a round up and is managing long term on the range. Summary: Pzp darting should be used on the range to control herd numbers. Consider more autonomy of the volunteer darters who may be able to cover more "ground" due to not having other commitments of work etc. for the BLM. Many thanks for the consideration of my views on this matter. I hope very much that people involved can work together and not put horses lives at risk (which they may be if taken to holding). I have also attached this as a pdf in case it helps with reading.
44	Yes	Wild Horses / Photograph / Livestock / Greater Sage Grouse / Policy	I have been informed of the proposed roundup and removal of wild horses in the Onaqui Herd Management Area. Would you please accept the following comments on the BLM Scoping Notice for the proposed roundup and removal of wild horses in the Onaqui Herd Management Area (HMA). Thank you. As you know, the Onaqui HMA is one of a few HMAs within proximity to a large city. This fact makes them more accessible for the public to view, photograph and enjoy. This herd is a unique wild horse population. They are beloved by visitors who travel to this area solely to observe and enjoy these horses who have been an important part of the Utah's landscape and history. If you were to do a search on Facebook for the number of photos you might see from this HMA you might be surprised. I have a number of facebook friends that love to photograph in this HMA. Thus, the proposal to remove the vast majority of the Onaqui horses will have a very negative and harmful impact on the human enjoyment and the recreational use of these public lands. The Public Lands of America were introduced as a means of recreation for the Public, and later have become a means of profit for government and non-government entities. But the BLM should never forget the priority of these lands…human enjoyment and recreational use over private business profits. I make this statement because the "Multi-Use Management" for our Public Lands is destroying our lands, cutting off areas from public use and destroying the wildlife that call those lands home. This includes wild horses and burros. I do understand that the Sage Grouse make their home in this HMA also. But I do believe that cattle are allowed to graze in this area too. Cattle destroy our public lands, decimate vegetation and destroy wildlife areas. Cattle are not wildlife; only a domestic non wildlife species and are only introduced on Public Lands for the profit and gain of private business entities. Neither the cattle or the private business entities provide any value for public viewing and enjoyment. Most of the Public would agree that cattle should not be given priority over our wild horses (i.e., wildlife) and they do not enjoy seeing them roam on our Public Lands. In regards to the BLM Environmental Assessment: Manage the wild horses for public viewing, photography and enjoyment. Manage the wild horses as an important part of Utah's landscape and history. Manage the wild horses as wildlife, and give them priority over other "Multi-Use" entities including "For Profit" businesses both government and nongovernment related. Manage the wild horses with fertility control, not removals. This would be in accordance with the recommendations of the National Academy of Sciences (NAS) in its 2013 report, "Using Science to Improve the BLM Wild Horse and Burro Program: A Way Forward." Immediately vaccinate a sufficient number of mares yearly to attain zero population growth in the shortest amount of time. Least intrusive methods for application of PZP fertility control should be used, including remote darting and/or bait and water trapping. Increase the allowable number of horses (AML) in this HMA to, at minimum, accommodate the current population level, making forage adjustments, if necessary, pursuant to CFR 43 C.F.R. 4710.5(a) to ensure that wild horses are given equitable usage of our public lands. Restore Herd Area territory to active management status (i.e., increasing the size of the Onaqui HMA to the 507,681 acres which was originally designated by Congress, but was not followed through by our government). Designate the Onaqui HMA as a National Wild Horse Range due to its proximity to Salt Lake City, the accessibility of the Onaqui herds for photographing and wild horse viewing, the popularity of this herd with visitors and tourists and the economic benefits of the Onaqui horses to the local area. This would be a successful designation for the wild horses, for Americans, for the Tourist, and for the economic growth of the area. Temporarily fence off burn area to allow regeneration without removal of wild horses. Wild horses are wildlife and if you are not removing other wildlife from the area, the wild horses should not be removed either. However, if any removals are deemed necessary after the above, they must be small in numbers, incremental and limited to horses who can either be adopted or placed in sanctuaries. Watching the BLM Management of our Wild Horses has been a sad state of affairs for me personally. Our wild horses have been scape-goated for land degradation when you can see that the cattle far outnumber the wild horses on the same lands. In Checkerboard areas, the cattle ranchers have pushed and pushed to remove wild horses and burros because they understand that America's Public Lands are valuable for their own use. Oil, Gas and Mining have become profitable for both our government and for business entities, and our Public Lands provide vast amounts to land for just that. Our Public Lands have become a veritable "Gold Mine" for profiteers. Also, I view our wild horses and burros as "wildlife", but the BLM does not as shown by the roundups and removals (i.e., does the BLM roundup and remove deer, elk, wolves, sage grouse???). The NAS report contracted by the Interior was a science based set of tools, but has been thoroughly ignored by the BLM and both Secretary of Interiors since it came out. Now our government wants to destroy our wild horses because of the non-science based management methods that have been deployed by the themselves. There are better ways, but our government has refused to listen to the real public…those that hold our lands and our wildlife dear because of their real love of wildlife and beauty of our lands. However, it is my hope that because this HMA is very unique and loved by the Public, you will change your Environmental Assessment to include other factors that give our wildlife a fighting chance on our Public Lands for both the good of the Public AND for the wildlife that they are. Thank you for the opportunity to comment.

45	Yes	Policy / Livestock / Wildlife / Wild Horses / NHPA Compliance / Plan Amendment / NEPA Compliance-Mitigation	Thank you for the opportunity to contribute to the EA for the Onaqui Wild Horse Herd and management area project. Is the diminution of the Onaqui Heritage Herd just one more example of our Heritage removed from our public lands at tax payer expense to front an Extraction industry by conversion of our protected FREE ROAMING wildlife species. An entire cottage industry has been BLM funded for the sale, warehousing, and euthanasia of a National Treasure. Or is BLM amenable to available/viable options by adding our herds to state fish and game inventories, and funding of non game special status species, and/or dedicating herd management areas as ACEC wildlife preserves? The following information is derived from online web searches, and may be restated. How does 450 horses on 507,681 HMA acres compare or balance with the ratio between livestock, elk, deer, antelope, bighorn? Utah wildlife stats indicate that there are between 60-80,000 Elk. In the ten states where BLM manages horses, there are 270 herd areas. In Utah, about 2,600 horses are found among 22 different herds scattered across the state. Two herds of burros containing about 100 animals are found on public lands in southeastern Utah. Wild Horses and Burros in Utah - KBR Horse Net www.kbrhorse.net/whb/blmutah.html. BLM also claims that the Onaqui herds were introduced to Utah in the late 1800's. https://heritage.utah.gov/history/uhg-history-american-indians-ch-1. This source notes that in the early 1700s the horse was the Spaniard's most important contribution to Native American The dispersion of these animals began in the early 1600s, spreading out from New Mexico to the north and east in an arc that first introduced them onto the Great Plains and then into the Great Basin. By the early 1700s, all of the tribes in Utah had some access to the horse, some adopting it as a means of transportation, others accepting it as a source of food depending on available grazing resources. For centuries the segregated herds evolved as distinct population segments, and, sharing historic landscapes with Native Americans, Spanish and Western settlers. In Utah, DOI, BLM and US Fish and Wildlife Service must consider adding Onaqui wild horses and other heritage herds to their inventory of NATIVE special status non-game species. Consideration the 2004 the 50-million-year-old fossil by Tynsky's 2004 discovery in the Wasatch Range of Utah, and also:https://en.wikipedia.org/wiki/Hagerman_Horse_Quarry. (Mountain States v. Hodel) "In structure and purpose, the Wild Free-Roaming Horses and Burros Act is nothing more than a land-use regulation enacted by Congress to ensure the survival of a particular species of wildlife. At the outset, it is important to note that wild horses and burros are no less "wild" animals than are the grizzly bears that roam our national parks and forests." The Onaquis and wild horses in Utah have their own special claim to distinct Equus population segments and/or evolutionarily significant units (ESU). This was first conceptualized by Ryder in 1986, of a population of organisms that is considered distinct for purposes of conservation. Delineating ESUs is important when considering conservation action. This term can apply to any species, subspecies, geographic race, or population. An ESU might comprise single/multiple populations exchanging a degree of gene flow, such as meta-populations. Differences between ESU concepts lie more in the criteria used to define the ESUs themselves rather than in their fundamental essence. Definitions of an ESU generally include at least one of the following criteria: Current geographic separation, Genetic differentiation at neutral markers among related ESUs caused by past restriction of gene flow, or locally adapted phenotypic traits caused by differences in selection. In Mar of 2016, Environmental Program Manager Karen.Miner@wildlife.ca.gov) stated "When and if available scientific information convinces the experts that determine the checklist of native species to North America that Equus caballus should be considered as an indigenous species, they will make the change in the next revision to the list, and then we would take that fact into consideration for inclusion on our state animal lists" Ms. Miner has since been informed that "Equus Caballus may not be the fossil evidence that meets the criteria for the listing consideration because the experts" may incorporate the that E caballus is a domesticated species v. E feras, its closest wild species. See more: http://www.livescience.com/9589-surprising-history-america-wild-horses.html (excerpt) animals that on paleontological grounds could be recognized as subspecies of the modern horse originated in North America between 1 million and 2 million years ago. When Linnaeus coined the species name, E. caballus, however, he only had the domesticated animal in mind. Its closest wild ancestor may have been the tarpan, often classified as E. ferus; there is no evidence, though, that the tarpan was a different species. In any case the domesticated horse probably did not arise at a single place and time, but was bred from several wild varieties by Eurasian herders. Has BLM implemented Forest Service recommendations "Using Science to Improve the BLM WILD HORSE see: https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprd3796106.pdf. This study was supported by Contract Ll1PC00058 between the National Academy of Sciences and the ... STEVEN PETERSEN, Brigham Young University, Provo, Utah ..... challenged BLM's Wild Horse and Burro Program since its inception. ... effective for the variety of landscapes occupied by free-ranging equids. Under the 1971 inventory mandate there are thousands of un inventoried acres available to wild horses & burros. New evidence of historic/native landscapes are sufficient evidence to amend cumulative deficient Resource Management plans; Particularly areas that have been devastated by fire, drought and overgrazing by livestock and free roaming wildlife, while American native wild horses and burros are not free roaming. They are restricted to reservations, that is federal land which has been withdrawn for a specific purpose (FLPMA). As the Onaqui herd planning area may be amended, then birth rates may be managed with PZP and adoption. It would appear that special livestock interests have usurped the conservation, preservation, restoration of Federally protected special status species of wildlife equids under the full purposes and objectives of Congressional Acts ie 1966 National Hististoric Preservation Act, 1971 Free Roaming Wild Horse and Burro Act, 1973 Endangered species Act and 1976 FLPMA. Can DOI abrogate its fiduciary public duty to preserve our Heritage Herds over the mere privilege of "regulated" livestock? Can Administrators unreasonably restrict or prohibit, temporarily or permanently, the exercise of that duty? The Utah livestock interests may be viewed by maps allotment maps and county management plans. See http://www.wfrc.org/new_wfrc/crmp/livestock-grazing/. I can personally attest that Utah BLM has a pretty marginal-at-best record of compliance with the National Historic Preservation Act (NHPA). A large part of this record results from a persistent misinterpretation of the statute as one that extends consideration only to impacts on archaeological sites, as individually designed and interpreted by archaeologists, with an occasional nod to historic buildings and structures. BLM has also consistently given short shrift to the concerns of tribes and others regarding historic access to cultural landscapes including wild horses/burros. It would surely be timely for BLM to rethink its approach to NHPA compliance, opening its mind to landscape-scale thinking, including that practiced by tribes and the public. As Dr. TF King noted "BLM should get it through its collective head that "historic property" does not mean only "archaeological site" in the language of the statute the term includes "districts, sites, buildings, structures and objects" eligible for the National Register of Historic Places. Landscapes which directs Interior agencies to undertake planning and impact-mitigation management – can include both sites or districts, depending on their size and complexity, and merit consideration in planning under Sections 106 and 110 of NHPA. When the district court in San Francisco raised the question of whether a living animal could be classified as an "object" eligible for the National Register and hence for consideration under NHPA. The Secretary, although responsible for the National Register, has never addressed this question. BLM continues to ignore both the possible eligibility of animals for the Register and the certain eligibility of landscapes that comprise the traditional and culturally valued ranges of animals like horses and burros." BLM has the opportunity to re-think its understanding of its responsibilities under NHPA with reference to landscapes and recognize explicitly that the traditional ranges of wild horses and burros may be among the landscapes that are eligible for inclusion in the National Register. There is no question that wild horses and burros—and hence the landscapes on which they range—are associated with significant events and patterns of events in American history. Such association constitutes one of the criteria set forth in the Department's regulations (36 CFR 60.4(a) as a basis for Register eligibility." BLM's revised National Programmatic Agreement, executed with the National Conference of State Historic Preservation Officers and the ACHP in 2012, called for the BLM-SHPO Protocols to be updated by Feb. 9, 2015 to reflect the changes in the NPA. These Protocols spell out how BLM offices will work with the SHPO: cooperating on preservation planning and public outreach efforts, sharing information, meeting reporting requirements, AND CONSULTING ON SECTION 106 UNDERTAKINGS. The Protocols do not alter BLM's responsibilities to consult with Indian tribes or other consulting parties under Section 106 undertakings. Does Utah claim a categorical exclusion of wild equids capture, conversion and sale of the Onaqui herd? IS DOI/BLM/USFWS aware that any time a regulation is promulgated by an agency under a law, it is an exercise of the police power. Generally, when testing the appropriateness of a law the court will: 1. first decide if the law to remove the Onaqui Herd is within the allowable concern of the public health, safety and welfare. Assuming that the law deals with an appropriate topic (protection of a wildlife species), then 2. the second question is ;Are the restrictions of the law rationally related to that lawful interest in the management of the Onaqui herd v livestock and other wildlife? 3. Third, assuming that the topic is appropriate and that the provisions are rationally related, then the court will set aside a law as inappropriate only if it violates some constitutional right of a citizen (this can be a state constitution, but is usually the federal constitution.) Considering the Public Trust doctrine applicable to Wild Equids, it may be applicable to both state and federal constitutions. Is it then true that by operation of wildlife laws, Americans may claim that the DOI Secretary, BLM and Wildlife Agencies had a fiduciary duty to exercise all options to enforce protections applicable to "federal protected species" How can DOI/BLM/USFWS relocate Onaqui "excess horses without impacting the BLM Budget used to extract and convert for commercial purposes of sale or euthanasia? In the West Douglas case the court determined that BLM lacked jurisdiction to manage non excess wild horses and burros that were removed from reserved public land ranges. The court was not asked nor did it address the probability that USFWS may be responsible to protect and manage a protected species that had been removed from its native habitat. Is DOI, BLM, or USFWS considering this prospect in the EA of the Onaqui herd and HMA. Is this an issue for consultation? Are the following funds available amend the RMP and establish Herd Areas as National Herd Area Historic Landscapes? http://ncshpo.org/issues/historic-preservation-fund/ For fiscal year 2017, Congress provided a total of $80.9 million from the HPF. Of this amount, $47.925 million was awarded to State Historic Preservation Officers and $10.485 million for Tribal Historic Preservation Officers. Congress also provided $500,000 for projects that will increase diversity in the National Register of Historic Places and in the National Historic Landmarks programs, $5 million for Save America's Treasures. https://heritagecoalition.org/spending-deal-means-heritage-preservation/. The National Historic Preservation Act Review of State programs mandates repair and restoration of the identified resources. It states: "(2) (A) Periodically, but not less than every 4 years after the approval of any State program under this subsection, the Secretary, in consultation with the Council on the appropriate provisions of this Act, and in cooperation with the State Historic Preservation Officer, shall evaluate the program to determine whether it is consistent with this Act. (B) If, at any time, the Secretary determines that a major aspect of a State program is not consistent with this Act, the Secretary shall disapprove the program and suspend in whole or in part any contracts or cooperative agreements with the State and the State Historic Preservation Officer under this Act, until the program is consistent with this Act, unless the Secretary determines that the program will be made consistent with this Act within a reasonable period of time. (C) The Secretary, in consultation with State Historic Preservation Officers, shall establish oversight methods to ensure State program consistency and quality without imposing undue review burdens on State Historic Preservation Officers. Re the Anoqui Herd Area, has BLM considered: A. Mitigation. The Council on Environmental Quality (CEQ) defined mitigation in its regulations at 40 CFR 1508.20 the mitigation elements are categorized into three general types that form a sequence: avoidance, minimization, and compensatory mitigation for remaining unavoidable (also known as residual) impacts. The elements of mitigation, a sequenced approach to addressing the foreseeable impacts to resources and their values, services, and functions. First, impacts should be avoided by altering project design, location, or declining to authorize the project; then minimized through project modifications and permit conditions; and, generally, only then compensated (HOW?) for remaining unavoidable impacts after all appropriate and practicable avoidance and minimization measures have been applied. This policy affirms this hierarchical approach, while recognizing that in limited situations, specific circumstances may exist that warrant an alternative from this sequence, such as when seeking to achieve the maximum benefit to impacted resources and their values, services, and functions. Will BLM consider the mitigation opportunities for the Anoqui Herd and Herd area available at: http://www.fishwildlife.org/index.php?section=teaming_with_wildlife.

46	Yes	Policy / Livestock / Wild Horses	... BLM says 450 horses on 507,681 HMA/HA acres is too many... These horses are beautiful and healthy, and loved as friends by 1000's of people. There are cattle and sheep both allowed on this HMA, and in spite of only being allotted 3% of the forage, these horses are always healthy and fat... If and when the "range is depleted" it's because of the cattle and sheep which far outnumber the horses... This 1/2 million acre Herd Management Area has been assigned an Appropriate Management Level of only 121-210 wild horses... anything over that number is "overpopulated" by Bureau of Land Management standards...AML is a false, unscientific way to determine over-population of our herds. How many cattle and sheep graze there?... We should be able to demand that figure before you destroy our wild herds… If BLM takes the Onaqui Herd down to low AML of 121, and does their famous stallions are to outnumber mares ratio, then also uses birth control on the few remaining mares, this herd will be below genetic viability… The current genetics in this herd produced the subject of the winning photograph of the Equus Film Festival Award... Now BLM wants to take over the herd's breeding program, with the ultimate goal of total elimination. Do not remove these wild horses in the Onaqui HMA/HA ... You know full well you will be jeopardizing their lives in this Political arena. Leave the wild horses alone, call a moratorium on all Herd Area removals until Bureau of Land Management is fully investigated for corruption and waste within the Grazing Permit Program...AML is not mentioned in the Wild Free Roaming Horses and Burro Act as reason to remove... BLM is supposed to do a scientific examination of herd areas to determine healthy populations in each area... Livestock should be removed in HMA's before wild horses, if forage is being affected adversely. #1 We recommend that the BLM reevaluate the established Appropriate Management Level (AML), which is currently 121 to 210 horses. We feel that the range provides enough feed and water to increase the AML. #2 A large reduction in herd size, would put the horses at risk of inbreeding, which may cause genetic problems. #3 This herd is very important to the American public. It provides incredible value to the many tourists, photographers and observers who enjoy seeing this herd in its natural environment. It also provides enjoyment to the thousands of people who follow it through numerous online sources where pictures of the herd are posted. Further, this herd is increasingly driving dollars to the local community as tourists travel to visit the horses. #4 We demand to know how many cattle and sheep graze on this HMA/HA, and demand any removal of wild horses be canceled until the entire area is re-evaluated... and until Bureau of Land Management is audited for corruption.
47	No	Policy / Wild Horses / Greater Sage-Grouse	The removal of wild horses directly affects the ecology of our public lands. As a TV producer I have reported and continue to report the absolute corruption of the BLM in regard to its mismanagement and removal of our wild horses and burros which I submit to you as proof of what I say. Please see attachments below. Wild horses decrease wildfire debris. They also prevent erosion as their hoof prints placed careful around the vegetation they eat provides potholes for rain. I show this on my TV series Meet America and share the link with you. This is a clip I took in Battle Mountain, Nevada in 2012. [Video Link for “footprints dont lie”] I predict nothing will prevent you from removing these wild horses due to cattle ranching influences and due to the fact we have no men of integrity in our government. They won't hire such people anymore. America is dying and the horses are the messengers of that. However, I submit the comments below just to prove to the public, once again, how corrupt BLM is. • Do not permanently remove 325 horses (72%) as they might be killed in holding, per the most recent recommendation of the BLM National Advisory Board. • Removing these horses will render the herd genetically non-viable per equine geneticist, Dr. Gus Cothran. He advises at least 150-200 horses must remain in the herd to ensure genetic viability. • The BLM cites the preservation of sage grouse territory as a reason for removing these horses. Yet, there are only a few places where wild horses and sage grouse live together in the HMA. In those places fencing can mitigate the potential harm to sage grouse in lieu of permanent removal. • The U.S. Fish & Wildlife Service released a study in 2012 that did not cite wild horses as one of the top five threats to sage grouse. Instead, it cites energy development, transmission right of ways, fire, invasive species, and commercial development as the top threats. • BLM must focus on fertility control. Their plan to treat 60 mares in FY2018 is not adequate to slow reproduction. Volunteers with the Wild Horses of America Foundation are ready and able to implement a larger population control program. Attachment 1: Regarding Wild Horse Freedom Federation’s White Paper. Attachment 2: White Paper Attachment 3: Letter from Congress of the United States (Farr and Grisham) to US Department of Justice (Lynch and Cruden) Attachment 4 : Video Link for “footprints dont lie”: https://www.youtube.com/watch?v=vdfhVKPuqUw&feature=youtu.be
48	Yes	Sage-Grouse / Wild Horses / Greater Sage-Grouse	BLM—It has come to my attention that the Utah BLM is considering removing a majority of the Onaqui Mountain wild horse herd—325 horses out of a herd of 450. This is a reckless gutting of the genetic viability of this herd, a 72% decrease that can not sustain genetic resilience, a authoritative opinion of Dr Gus Cothran, equine geneticist. The citation by BLM that the horses are to be removed to preserve sage grouse habitat also is not underpinned by the facts at hand. The public is well aware of the proposal by the current administration to ACTIVELY REDUCE sage grouse habitat protection, as announced by Secretary of the Interior Ryan Zinke, who released the recommendations of his sage-grouse “review team”. A short summary of some of the recommendations does not seem to support the contention by Utah BLM that wild horses are a significant impact to Sage Grouse. Instead, the list tries to damage the already concocted 5 year planning process that went into the good-faith flexibility of the 2015 Approved Resource Management Plan Amendments (ARMPAs) and test how far the Interior Department can bend the rules without getting sued. Where is the “protection of Sage Grouse”, as purported to be driving a removal from Onaqui HMA? In fact, the BLM plan for wild horse removals is factually contradicted by a U.S. Fish & Wildlife Service study released in 2012 that did not cite wild horses as one of the top five threats to sage grouse. Instead, it cites energy development, transmission right of ways, fire, invasive species, and commercial development as the top threats. Interestingly, these human installations are the very things Zinke has openly committed to smoothing the way for opening on our public lands. The round-up proposed by BLM in Onaqui would seem to be driven instead by industrial considerations, as described in the list below, gleaned from Zinke’s team list. I am a citizen and taxpayer able to discern when scapegoats, such as the wild horses, are being used for distraction purposes. The Zinke report and the forthcoming processes that will revise the ARMPAs are determined to weaken any provisions that inhibit industry, including proposals to: Narrow the buffer zones that would protect leks from fossil fuel development disturbance; Remove Sagebrush Focal Area restrictions (“SFA” the most important habitat) for fluid mineral operations, and ultimately consider getting rid of SFA altogether; Train staff to weaken grazing Habitat Objectives so that they are not included as terms and conditions of livestock grazing permits in key grouse habitats; Encourage captive breeding of grouse and increased predator killing – which science has proven don’t work – instead of habitat protection which does; and Create the false impression that livestock grazing is good for sage-grouse habitat, when in fact there is no scientific evidence that even light grazing by domestic livestock is beneficial. I am a astute reader and am able to discern conflicts of interest masquerading as cover for “takings” Sage Grouse AND wild horses are protected and stand to get in the way of industrial development for private profit. The removal of the wild horses by BLM in the Onaqui HMA must change, to focus instead on fertility control. The plan to treat 60 mares in FY2018 is not adequate to slow reproduction. Volunteers with the Wild Horses of America Foundation are ready and able to implement a larger population control program. I do not want my taxpayer dollars used on another expensive round-up and stockyard impoundment for wild horses. Finally, per the most recent recommendation of the BLM National Advisory Board, all wild horses in holding are to be slaughtered or sold to foreign countries for slaughter in the next three years. This is NOT acceptable to the public at large, who are granted by the WILD FREE-ROAMING HORSES AND BURROS ACT OF 1971 (PUBLIC LAW 92-195) to be the public which enjoys and oversees the animal’s protection. Any horses taken in the Onaqui HMA could become caught in this tug of war between Federal agencies.
49	--	--	Same as 8.

50	Yes	Policy / Wild Horses / Recreation	Thank you for the opportunity to comment on the proposed roundup and removal of more than 325 mustangs from Onaqui Mountain Herd Management Area. Like James Schnepel, president of Wild Horses of America Foundation, I have an intimate relationship with a mustang herd; mine is Spring Creek Basin Herd Management Area in Southwest Colorado. I also have a close partnership with Spring Creek Basin's manager (Tres Rios Field Office, Dolores, Colorado) as we work together for the successful on-range management of our mustangs. And as a fellow darter (PZP fertility-control vaccine) and documenter, I take his understanding of the Onaqui herd and his recommendations to BLM seriously concerning the proposed roundup operation there. Importantly at this time, the fate of tens of thousands of American wild horses and burros hangs in the balance, and destruction unfortunately is a potential fate for any animals rounded up and removed from their home ranges. Given the successful PZP program at Onaqui Mountain Herd Management Area, the removal of any horses should be balanced with that extremely unpopular and devastating possibility. Based on the recommendation of Wild Horses of America, the proposed action to remove 72 percent of the existing herd represents a devastating blow to the thriving ecological balance and natural behaviors of this herd, beloved by Utahns and out-of-state visitors each year. In 2011, a roundup was held in Spring Creek Basin. Our coalition advocacy group Disappointment Wild Bunch Partners worked with BLM to hold this roundup for the benefit of the entire herd. We believed that 1) by removing a smaller number of horses, we would preserve the health of the range, and 2) through community outreach, we would be able to get most or all of the removed horses adopted. Also, we supported the implementation of a PZP program, using native PZP with annual darting by a volunteer darter (me). BLM removed 40 horses, and with PZP, it has taken six years to get to a population of 60 adult horses. Spring Creek Basin is a small herd management area – 22,000 acres – and everyone agrees that PZP can work here. And of course it does. Onaqui Mountain is a larger herd management area – 240,153 acres – and as such represents a place where wild horses are en route to being successfully managed with volunteer/BLM partnerships using PZP fertility control. Under the "research" category of this scoping notice, this is significant. Please give advocates and managers the opportunity to use PZP to its full potential. Genetic impacts According to Wild Horses of America, four main groups of wild horses exist within the Onaqui Mountain herd: Davis Mountain group, Simpson Springs group, East Onaqui group, Erickson Pass group, and miscellaneous groups and/or solo horses. Quoting Schnepel: "The groups mentioned above are very important when it comes to determining any removal numbers, particularly when you consider the importance of genetic viability. "With an equal spread, a 72 percent reduction would reduce the Onaqui Mountain Group to about 50 horses, the Simpson Springs Group to about 36 horses, the East Onaqui Group to about 17 horses, and the Erickson Pass Group to about 11 horses. "While there is certainly room to debate the exact numbers, the overall point remains: Many of the groups that make up the Onaqui Mountain herd would be at numbers that would not sustain genetic viability. "The BLM's lead equine geneticist, Dr. Gus Cothran, believes that herd sizes need to be, at a minimum, between 150 and 200 animals." Given the looming threat of "lethal management," PZP-based management should be given every opportunity to work on the range. Resource allocation,Resources are reportedly very good for the horses, wildlife, sheep and cattle that share the range. Partnerships between ranchers, advocates and BLM employees also are good, without many of the conflicts seen on other herd management areas. Onaqui Mountain Herd Management Area – at more than 240,000 acres, with the greater herd area acreage at more than 507,000 acres – surely seems to be a candidate for an increased AML. In Spring Creek Basin, the livestock grazing allotment was closed two years ago in order to eliminate grazing conflicts and make the mustangs the primary resource to be managed on the range. We are conducting vegetation monitoring specifically measuring the resources with an eye toward increasing the AML in Spring Creek Basin. The current AML of 35 to 65 adult horses is not enough to sustain genetic viability of this herd without introductions (which occurred in mid-1990, 2001 and 2008), suggested by equine geneticist Dr. Gus Cothran. The popular and PZP-managed Onaqui Mountain herd seems to be a candidate for an increase in AML, especially concentrating on the "research" category of the current scoping notice with ongoing vegetation monitoring. Until those studies have been done and the results analyzed, the removal of 72 percent of the herd is unwarranted. Fire, sage grouse, human damage These topics are covered by sources more familiar with the range. According to those sources, the effects aren't significant enough to concern the horses – or other wildlife – in affected areas. Damage caused by off-road use of ATVs, etc., can be mitigated by education. We struggle with the same human-caused challenges in Spring Creek Basin. Signs and talking to visitors during high-use periods (holidays and hunting seasons) have helped with this issue. Fertility control As stated by Schnepel, "Wild Horses of America partners with the BLM to treat the Onaqui mares with PZP delivered by dart. These PZP treatments started in September of 2015, so we have completed two years on this project. "Of course, it takes time to stabilize a population through the use of contraception, but once it happens we will be in a very good place. Gather and removals will be farther and fewer between (if at all), and the end result will be a big savings to the U.S. taxpayer and a boon to the horses who can remain on their native land." This is absolutely true. Conducting a significant roundup-and-removal operation just two years since the implementation of the Onaqui PZP program does not allow managers to see real-world effects of PZP in stabilizing the herd's population. Also according to Schnepel: "On the subject of cost, lately I have heard the figure of $2,600 being spread around as 'the cost to treat each horse with PZP.' To the uninformed, this implies that darting horses with PZP is expensive! However, the $2,600 cost only occurs when the BLM gathers a horse by helicopter, treats it with a primer dose, holds and feeds the horse for a few weeks, treats it with a booster dose, then returns it to the range. "The cost to treat a mare in the field is the price of the dose plus the price of the dart, which is just under $30 per dose. Plus, the time and costs for the darter and observer. When a volunteer is used, such as from our group, there is no added cost to the BLM." Again, absolutely true. At BLM's Wild Horse and Burro Program's National Advisory Board meeting held Oct. 18-19 in Grand Junction, Colo., BLM presented the cost to treat one mare with one dose of PZP as $2,500. BLM suggested that the cost to round up that mare was $1,000, leaving the cost of PZP treatment as $1,500. Without the cost of a helicopter, contractor and crew, and feeding/penning the mare(s), the cost to treat one mare with one dose of PZP (either primer or booster) is $27, according to Kimberly Frank at the Science and Conservation Center. That's one dose of PZP, mixed with appropriate adjuvant, and the dart. My friend Kat Wilder called Frank during the meeting's lunch break and was sent an actual invoice (sent to Colorado BLM), which she then read during the meeting's public comments. That invoice supports that dollar amount of the cost of PZP to BLM. The cost of darters such as Schnepel and myself, members of the Little Book Cliffs darting team, Sand Wash Advocate Team and other volunteers is $0. BLM may choose to reimburse its volunteers for the cost of gas, lodging, etc. We do what we do for the value of the horses and the knowledge that each dart means a foal that doesn't grow up to be rounded up, removed from its family and range to be either adopted or penned … or much worse. Using volunteers to treat mares with fertility control in order to prevent "overpopulation" and the resultant roundups and removals from the range (where the horses cost nothing and provide priceless visitation opportunities), not to mention "warehousing" in short-term holding corrals and long-term pastures, is absolutely the most cost-effective form of wild-horse on-range management currently available. Says Schnepel: "Our group is willing to spend more time and money (at no cost to the BLM) to dart as many horses as needed to control herd growth. One way to increase darting efficiency, and reduce the costs to the BLM, is to allow our group to have more autonomy in the field and not be accompanied by BLM employees as frequently as we have been in the past. This would be a similar structure to how other darting programs are being implemented in BLM-managed herds." Please, please take advantage of this volunteer-driven partnership for the benefit of the Onaqui Mountain mustangs. Also from Schnepel: "I firmly believe that we can continue to improve the contraception management plan for the Onaqui to the point where it not only successfully controls herd growth on the range, but also serves as a model that can be implemented in other HMAs in this state, and in other states." Absolutely. We've seen it happen in Spring Creek Basin and other places. Onaqui Mountain Herd Management Area already is talked about among advocates as a model. Conclusion I fully support the recommendations of James Schnepel and Wild Horses of America as stated below: General proposals: 1. Remove no horses. Instead, devote some of the money saved toward increasing the use of contraception to gain control of herd growth. "It cost $83,219.14 in 2012 to gather 155 head, remove 34 head and transport them to the holding facility in Delta, Utah." ~ Onaqui Mountain Herd Management Area Fertility Control Environmental Assessment (DOI-BLM-UT-W010-2014-0021-EA) 2. Fully treat (primer and booster) at least 80-90 mares with PZP in FY18, and plan to adjust that figure up in subsequent years as needed to gain control of herd growth. 3. Implement PZP treatment strategies such as bait/water trapping, as needed, to treat mares that are too difficult to dart remotely by rifle. 4. Implement methods to reduce the amount of off-road travel that is occurring on the range to enhance conditions for all users. 5. Enact measures to protect sage grouse habitat and fire restoration areas that do not require the removal of wild horses. 6. Reassess the current AML (121-210 horses) using the latest and best scientific practices. 7. Expand the HMA to include more, or all, of the 507,681 acres of the Herd Area. 8. That the Onaqui Mountain Herd be designated a National Wild Horse Range and expand the size from 240,153 acres to 507,681 acres. If a gather commences: 1. That the focus of the gather is solely to catch the mares that are difficult to dart by rifle on foot, treat them with contraception, and release them back to the range. If a removal commences: 1. If horses are removed, that the number of horses removed should be far, far fewer than the "over 325" mentioned in the scoping announcement. At very minimum, high AML should be left on the range. Over 300 horses, if carefully selected, would maintain most of the integrity of the herd. 2. Use the money saved from removing fewer horses and use it to increase the use of contraception. 3. That helicopters will not be used. Bait trapping is generally a more humane way to gather the horses, and it may have fewer impacts on the horses' future adoptability. Also, this will allow fewer numbers to be removed at a time, and horses that do not fit removal criteria can be released after having a less traumatic experience. 4. That a natural male/female balance is considered when deciding which horses to remove and which horses to release back the range. Do not use sex loading (too many male horses) as a method of trying to reduce the reproductive rate. Use PZP for that. 5. That any horses that are removed will be transferred to a suitable private sanctuary* in Utah, if one is available. And/or, that the BLM will work with local advocates to ensure that every horse is adopted (this should be facilitated by the slower removal of trapping), and only bring horses off the range at a rate sustained by adoptions. 6. That emphasis be placed on: a. Horses that are less acclimated to people, that range in areas less visited by the public, and that are in the sage grouse habitat area. This will maintain the size and viability of the groups of horses most visited by photographers and observers, and will allow for easier PZP darting. b. Horses that are younger and therefore better candidates for adoption. (Older horses may be more habituated to life on the range, and less adaptable to a new life of domesticity. Also, they will not be entering their breeding years, and will be more likely to die sooner from natural causes, which will help to naturally control the herd size.) c. Focus on Groups (as defined above) of horses, as opposed to removing an even spread across all the Groups on the range. This will help retain the genetic viability of the remaining Groups, which will retain larger numbers. Horses in high priority sage grouse habitat should be chosen first.7. To have a plan to treat with PZP any mares released back to the range. Thank you for the partnerships you have cultivated with advocates like Jim Schnepel that contribute to healthy horses and healthy rangelands in Utah. Onaqui Mountain Herd Management Area IS a model for more BLM managers and volunteers to follow.

51	Yes	Policy / Wild Horses / Recreation /	Thank you for accepting comments on the potential plan for removing horses from the Onaqui HMA. As a frequent visitor to this HMA, and many others including Cedar Mountain, I am concerned with removing up to 325 horses for the following reasons: 1. Successful use of PZP on the population, if dosed at the appropriate times, can and will be far more beneficial to this publically known tourist attraction and will ensure the genetic viability of the herd. Fiscally responsibility is important and PZP is much more fiscally responsible for population control 2. Due to the uncertainty of the fate of the wild horses in holding facilities, both long and short-term, and the decisions of the markup of the budget in the Appropriations Committee, putting another 750 in peril is unconscionable. 3. The AML level of this HMA should be increased based on the range conditions. My last visit of this HMA should thousands of sheep and plenty of forage to increase the level. The AML should be based on scientific reasons. 4. The Onaqui herd is beloved by the American public; a short trip outside of Salt Lake City ensure additional revenue to the local communities including Tooele County. 5. If removal is decided, bait and/or water trapping is the most human method. 6. Removal of 75% of this herd will be devastating to the genetics and survival of this herd. If removal is decided, it is imperative that genetics are used to determine the survival of the herd. a. Consult with equine genetic experts with experts ensure that bloodlines and phenotypes are preserved. b. Phillip Sponenberg, DVM, PhD, is professor of Pathology and Genetics at the Virginia-Maryland Regional College of Veterinary Medicine at Virginia Tech in Blacksburg. i. Dr. Sponenberg has long had an interest in the genetic control of color in horses and other livestock. This work has involved collaboration with a large number of scientists as well as horse breeders. ii. In addition to working on coat color, he also is active in efforts to conserve rare breeds. c. Dr. E G Cothran, Texas A & M, College of Veterinary, Medicine / Biomedical Sciences, College Station, TX.77843 i. “Genetic analysis of wild horse and burro populations can provide valuable information about current levels of genetic variation. This information can then be used to make predictions about how particular management strategies will influence genetic variation in the herd. Thus, genetic analysis can be a useful tool in the overall management of wild horse and burro populations on public lands” https://www.blm.gov/nstc/resourcenotes/rn27.html d. Ernie Bailey, Coordinator, Horse Genome Project, Professor, MH Gluck Equine Research Center, University of Kentucky. http://www.ca.uky.edu/gluck/BaileyEF.asp e. Stephen Coleman, Assistant Professor, Department of Animal Sciences, Colorado State University - http://ansci.agsci.colostate.edu/ansci-faculty/ f. Stephen's main research interests center on understanding more of the relationship between an animal's genotype and the phenotype ultimately expressed. i. His lab, the Equine Breeding and Genetics Laboratory, is currently focused on developing a genetic evaluation program for horses, investigating the molecular basis of genetic selection and improvement, enhancing annotation and gene expression resources, and exploring the development and dynamics of the equine microbiome. g. Education of BLM personnel on genetics i. There is so much to be learned about genetics in our horses in order to maintain the genetic viability and variability. Most color assignments can be correctly made based on physical appearance or phenotype alone. However, genetic testing may be necessary to define phenotypes that are visually ambiguous or the color possibilities for offspring. Researchers at the Veterinary Genetics Laboratory and other institutions are working towards the identification of the specific genes and mutations responsible for coat color traits in the horse. https://www.vgl.ucdavis.edu/services/coatcolorhorse.php 7. The indigenous American icon, the wild horse, deserves to be managed on the range. Please consider my comments and work with local volunteers and the boots on the ground BLM employees who care for these horses.
52	Yes	Recreation / Photography / Livestock / Greater Sage Grouse / ESR	My name is Robert Hammer, and I maintain an internet resource titled Wild Horse Tourist (wildhorsetourist.com). This is neither a commercial business nor a non-profit organization, but rather a public service website funded completely from my own pocket. Wild Horse Tourist provides free descriptions, travel directions and related information for the many wild horse and burro herd areas throughout Utah. To date, my field research for this project has taken me to all 19 of Utah’s herd management areas and all but two of the ten unmanaged herd areas. Among these, the Onaqui Mountain HMA is near the top of the list of those with which I am most familiar, second only to the Cedar Mountains HMA. Wild Horse Tourist has been on-line for just over two years, and continues to grow in popularity. Page view statistics for the most recent 30 days show over 2,700 page views, with the Onaqui page accounting for 21% of those views. This is easily the most popular herd page on the site, and frequently serves as a direct entry point from web query results, indicating many visitors search the web specifically for this HMA. This is also the most frequently referenced area in e-mails received through the website from people planning wild horse spotting trips, many of whom are professional or aspiring photographers. Additionally, roughly half of my website traffic is from outside Utah, with about 10% of these from other countries around the world. Although I do not presently offer a professional tour service, I have escorted several tourists and photographers into our herd areas. I do this free of charge, although they often offer to cover fuel costs. Here again, Onaqui is the most popular destination. These experiences have inspired me to learn more about the history of the West Desert, beyond the well-known story of the Pony Express, to fill the travel time with stories about the origins of the roads and trails we are following as we make our way to and from the viewing locations. These stories all tie into the presumed origins of the Onaqui herd. I am not exaggerating when I say that my guests never fail to be fascinated by these stories, and ultimately awestruck when we find a band grazing those remote areas that don’t look much different than they would have appeared to Jedediah Smith nearly two hundred years ago, or a Pony Express rider a few decades later.I have also been inspired to do significant work toward establishing a commercial tour service (with BLM guide certification, of course) offering defined trips to Onaqui, and possibly the Cedar Mountains as well. My experience tells me these trips would be a common secondary draw for tourists visiting for some other purpose, and could easily become a primary draw for many vacationers in the future. The goal of seeing these horses in their wild habitat is central to this draw. The Onaqui area currently offers tourists and photographers high probability of mustang sightings on any given day. Nevertheless, even at current population levels, the quality and proximity of these sightings varies from day to day, and trips occasionally yield no sightings at all. I fear reducing this herd’s numbers too drastically will reverse these odds, making fruitless trips the norm and diminishing the quality of sightings that do occur. This would significantly erode the core experience drawing tourists and photographers to this area, if not effectively eliminating it. With this in mind, I am hopeful that you will consider re-evaluating your current Appropriate Management Level for the Onaqui Mountain HMA, or at the very least, targeting your proposed gather to leave the herd closer to the higher end of the currently established AML. Toward that end, I would also like to express my concerns about domestic sheep grazing in this HMA. I have on occasion ventured out to Simpson Springs to find the surrounding area swarming with sheep, nearly as far as the eye can see. While I do not know the specifics concerning AUM allocations for this herd area, nor the associated grazing fees, I do know that recent independent analyses of your grazing program have indicated that the combination of below-market fees and associated maintenance costs appear to generate a net loss to tax payers . Moreover, I’m sure you’ll understand how disappointing it is for out-of-state and international visitors to travel thousands of miles only to find a playa covered with sheep. I would like to know how the sage grouse protection and fire recovery efforts will affect domestic grazing in this HMA, and whether reductions in the wild horse herd size have taken priority over possible reductions in grazing allotments. My suggestion is that you consider reallocating AUM allotments to favor a larger herd, perhaps even double the current AML. Simultaneously, if you cannot phase out domestic grazing completely through AUM reallocation, perhaps graduating fees aggressively upward toward open market levels will ease demand, allowing smoother transition to higher AUMs for wild horses without significant impact to consolidated budgetary outcomes. I am also fully supportive of the recently implemented PZP darting program as a primary means of controlling future population growth and management costs. A well-managed plan in this direction would undoubtedly result in a net benefit to everyone concerned, including US taxpayers and the horses themselves. All of this would be in support of perpetuating growing interest in viewing and photographing this well-known and much-loved herd. I’ll continue to do my part in promoting these activities. I hope you’ll ensure these mustangs remain healthy, viable and plentiful for decades to come.
53	No	Wild Horses	I had visited the Onaqui herd area this past July 2017, I feel the number of horses that you have stated to be at 450, is way over the amount of Wild horses in the area. On my visit I had the pleasure of meeting county Comm Bitner. our conversation did not start off well as I had asked if they were there to see the Wild Horses and his comment was," they need to shut off the water to these things." I then let him know, that I was a Wild Horse Photographer, Advocate, and Republican voter. Our conversation continued for about 1 and 1/2 hours where we talked about the number of horses in the area and both had conclude that the population at that time was around 325, not your guesstimate of 450. We had also discussed water rights as most of the troughs in the area were dry; Comm Bitner had stated that the water rights in the area belonged to the permit holders and they have the right to turn the water off as it belongs to them. ???? I would like to remind you and the Commissioner, that these are Public Lands, not privately owned lands by the person whom holds the permit, they are only given permission of use, not ownership. My wife had traveled from one end to the other of this HMA and did not notice any damage to the grazing area, and as far as the burn areas, all were fenced off for restoration and we did not see any wild horses in the restoration area. Below are my suggestions when conducting an Ea on the Onaqui HMA. 1. Research the Impact on tourism in the area if a removal is conducted. 2. Also include in the EA, the impact of Cattle and Sheep have on the Onaqui HMA Before deciding to do removals of wild horse, and see if reducing the number of cattle and sheep would have a positive impact on the area. 3. Conduct research, before removals, to see if the Sage grouse even inhibits the area of concern. 4. Set and enforce restrictions on permit holder from shutting of water resources to other wildlife that have come accustomed to troughs and tanks within the area. To me, this would be one of the biggest problems there is, when shutting water off in some areas, you are causing all wildlife to congregate into one small area of a large HMA. 5. Continue and expand on the PZP program with volunteers, on our visit, we had only seen about 11 foals from 2017 in July, meaning that the program is working. Again, I believe that your numbers are overstated and the estimated number of removals needs to be drastically lowered, if any removals are need at all. Also I believe that Wild horses are an asset to the economy and to the environment. P.S please find in the attached, the breakdown of my wife and I`s wild horse tour during the summer of 2017. [Not reproduced here].
54	No	Wild Horses	I support and trust that the BLM will make the best choices in regards to the Onaqui Mountain herd in Utah. Feral horses are nice to look at, but I have witnessed damage caused by wild horses to rare riparian areas in the West Desert. In my opinion the BLM will consider all the stakeholders and make decisions based on what is the best solution.
55	No	Wild Horses	I think the BLM should do its best to manage the lands they have jurisdiction over. I agree with the action to remove a large share of wild horses for the purpose of regaining a balance for sage grouse and fire effected areas. I would like to see increased research and development of all effected species management once the herd is reduced.
56	No	Policy	Get rid of them all. And please don't stop with just this herd, the number of feral horses across America needs to be reduced to 1/10th their current numbers. I'd pay for a hunting tag to harvest a feral burro or horse. Thank you for protecting our wild, native, flura and fuana.
57	No	Wild Horses	Wanted to make a few comments about our wild horse population. 1. I love the wild horse. I have been raised on the flat lands of Millard County and love the wild horse. We have enjoyed them as a family as we vacation, hunted and partied in the West Desert. I enjoyed seeing them. 2. While I love the wild horses, we have to many. It does not matter where you go on the plains and in the hills of the West Desert, you see horses. Lots of horses. To many horses. Having looked at the resources that we have, it becomes apparent that we have been to kind to our wild horse population. I would like to recommend that we manage the herds to a significant lower number. The land is really being abused to the determent of the other wild life. The land shows the effect of these large numbers. I appreciate the opportunity to have some impute in to this very delicate subject. We need a few horses, but wow, not to the herd levels we have.

58	No	Greater Sage Grouse / Wild Horses	I just read the article in regard to the Onique band of mustangs. I was most interested in the comments about the sage grouse. I've document the Onique and Cedar Mountain bands sense 2004. I've been out there 286 times to date. I have some where around twenty thousand pictures of the mustangs. The reason I mention that information is that I have never seen not even one sage grouse where the Onique or Cedar Mountain mustangs live. I am in full agreement that the mustangs have to be rounded up and some taken off the range. Mainly due to the limited water available. Even considering the effect of the fire, the Onique band are fat and in good shape.
59	Yes	Policy / Wild Horses	The Onaqui HMA is one of a few HMAs within proximity to a large city which makes them more accessible for the public to enjoy. This herd is a unique wild horse population that is beloved by visitors who travel to this area solely to observe and enjoy these horses who have been an important part of the Utah's landscape and history. The proposal to remove the vast majority of the Onaqui horses will negatively impact the human enjoyment and recreational use of these public lands. ALTERNATIVES THAT MUST BE CONSIDERED IN THE ENVIRONMENTAL ASSESSMENT: 1. Manage the population with fertility control, not removals in accordance with the recommendations of the National Academy of Sciences (NAS) in its 2013 report, "Using Science to Improve the BLM Wild Horse and Burro Program: A Way Forward." Immediately vaccinate a sufficient number of mares yearly to attain zero population growth in the shortest amount of time. Least intrusive methods for application of PZP fertility control should be used, including remote darting and/or bait and water trapping; 2. Increase the allowable number of horses (AML) in this HMA to, at minimum, accommodate the current population level, making forage adjustments, if necessary, pursuant to CFR 43 C.F.R. 4710.5(a) to ensure that wild horses are given equitable usage of our public lands; 3. Restore Herd Area territory to active management status, thereby increasing the size of the Onaqui HMA to the 507,681 acres originally designated by Congress; 4. Designate the Onaqui HMA as a National Wild Horse Range due to its proximity to Salt Lake City, the accessibility of the Onaqui herds for photographing and wild horse viewing, the popularity of this herd with visitors and tourists and the economic benefits of the Onaqui horses to the local area; 5. Temporarily fence off burn area to allow regeneration without removal of wild horses; and 6. If any removals do take place, they must be small in numbers, incremental and limited to horses who can either be adopted or placed in sanctuaries. Multiple variations/additions. Addressing: Frustrations / Pleas / Greater Sage Crouse / ESR / Livestock / Quotes / Recreation.
60	Yes	Policy / Wild Horses / Greater Sage Grouse	BLM: • Do not permanently remove 325 horses (72%) as they might be killed in holding, per the most recent recommendation of the BLM National Advisory Board. • Removing these horses will render the herd genetically non-viable per equine geneticist, Dr. Gus Cothran. He advises at least 150-200 horses must remain in the herd to ensure genetic viability. • The BLM cites the preservation of sage grouse territory as a reason for removing these horses. Yet, there are only a few places where wild horses and sage grouse live together in the HMA. In those places fencing can mitigate the potential harm to sage grouse in lieu of permanent removal. • The U.S. Fish & Wildlife Service released a study in 2012 that did not cite wild horses as one of the top five threats to sage grouse. Instead, it cites energy development, transmission right of ways, fire, invasive species, and commercial development as the top threats. • BLM must focus on fertility control. Their plan to treat 60 mares in FY2018 is not adequate to slow reproduction. Volunteers with the Wild Horses of America Foundation are ready and able to implement a larger population control program. Multiple variations/additions.
61	Yes	Policy / Wild Horses / Greater Sage Grouse / ESR	This month YOU- the Bureau of Land Management (BLM) proposed a significant round-up and removal of 72% of the wild horses of the Onaqui Mountain Herd in Utah. It calls for the removal of "over 325" horses from a herd estimated at 450 horses (not counting the 2017 foals), with the goal of leaving only 121 horses on a range of over 240,000 acres. These horses mean a lot to us, as well as to the many photographers, tourists and observers who enjoy seeing them in the wild. Removing over 325 horses would be a devastating blow to this iconic herd. We recommend that the BLM not remove any horses from the Onaqui range, and instead increases the number of contraception doses to control herd growth. We are very concerned about removing any horses from any range right now due to the uncertainty of whether Congress will approve "euthanasia" as a solution to the approximately 45,000 horses that have already been removed from the range. We do not want to add to this number. • We recommend that the BLM reevaluate the established Appropriate Management Level (AML), which is currently 121 to 210 horses. We feel that the range provides enough feed and water to increase the AML. • We believe that a large reduction in herd size, particularly considering that the herd is spread out in segregated groups, would put the horses at risk of inbreeding, which may cause genetic problems. • We think that this herd is very important to the American public. It provides incredible value to the many tourists, photographers and observers who enjoy seeing this herd in its natural environment. It also provides enjoyment to the thousands of people who follow it through numerous online sources where pictures of the herd are posted. Further, this herd is increasingly driving dollars to the local community (Tooele County, Utah) as tourists travel to visit the horses. • We believe that any impacts to sage grouse habitat, wildfire restoration areas and resource impacts can be successfully mitigated/managed without removing 72% of the herd. • We strongly suggest if a removal occurs that: vastly fewer than 325 horses are removed, bait and water traps are used in place of helicopters, emphasis be placed on those horses that inhabit areas of the range that impact sage grouse habitat, emphasis be placed on removing horses only from areas where the public is not as likely to find and see wild horses, younger and more adoptable horses (sub 5 years old) are removed while leaving older horses on the range, that the BLM works with local advocates to place the horses in good adoptive homes, and horses are only removed from the range at a rate at which adoption can keep up. Some variations/additions.
62	Yes	Frustration / Plea / Greater Sage Grouse / Livestock / Photography / Policy / Education	Multiple variations.