



BOARD OF COMMISSIONERS

District 1 – Cody Davis

970-244-1605

June 11, 2024

Lynae Rogers
Wild Horse and Burro Specialist
Bureau of Land Management
Grand Junction Field Office
2815 H Road
Grand Junction, CO 81506

Re: DOI-BLM-CO-G010-0007-EA, Preliminary Environmental Assessment for the Little Book Cliffs Wild Horse Range Gather

Letter submitted electronically via ePlanning portal: <https://eplanning.blm.gov/eplanning-ui/project/2032020/510>

Dear Ms. Rogers:

On behalf of the Mesa County Board of County Commissioners (“Mesa County”), we thank you for the opportunity to review the Preliminary Environmental Assessment (“EA”) for the Little Book Cliffs Wild Horse Range (“LBCWHR”) Gather and offer the following comments.

Per Mesa County’s Resource Management Plan, we support the following Resource Management Objective and Policy Statements:

Resource Management Objective

A. Wild horses within the County shall be managed for a viable, healthy herd resulting in the thriving natural ecological balance (including the standards and guidelines for rangeland health) and multiple-use relationship in that area as required by the Act. (BLM, 2006)

Policy Statements

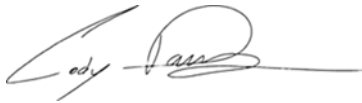
1. Support the gathering and removal of all excess horses (those above AML) from the rangelands.
2. The rights of the allotment holder should be considered equal to that of wild horses as per multiple use mandates.
3. Support and encourage the immediate removal of wild horses from private lands when notified of their presence as defined through the WFRHB Act and Colorado estray laws. Immediate removal should be conducted in such a manner so that the horses will not return to private lands nor be placed within County boundaries as long as the BLM is out of compliance with AML.
4. Support and encourage the immediate removal of all wild horses within Mesa County that are found outside the Little Book Cliffs HMA in accordance with the Act.
5. The County opposes any proposed enlargement or expansion of the current HMA boundaries and any new HMAs or HAs.
6. An inventory of wild horses should be completed at least every three years.
7. Remove horses to the lowest range of the AML to reduce the frequency of gathers. Because completing a gather is a lengthy and expensive undertaking often hampered by litigation, and because horses have no predators, if not gathered to the lowest end of AML population, numbers will rebound requiring another gather in too short of time.
8. Support the continued use of long-term fertility control such as spaying of mares but only as a last resort to other viable solutions, and if the numbers are already within AML.
9. The County encourages the creation of public education programs through the extension service to inform the public at large about the need to maintain healthy ecosystems and the differences between livestock, wild horse, and wildlife management needs and impacts.

10. Rulemaking should be pursued to give the BLM, and those who adopt wild horses, additional options for the disposal of wild horses to allow BLM to meet their existing statutory requirements.
11. Modifications of HMA boundaries would be allowed only for the purpose of reducing resource conflicts and adverse effects on private lands, so long as there is no net increase in boundary size or AML numbers.
12. Any reduction in HMA size should be completed with appropriate reduction in AML.
13. Develop and implement habitat management and/or monitoring plans to specifically determine impacts of wild horses on range, riparian, water, wildlife, and other resources.
14. Monitoring plans should accurately identify the causal factors in resource changes (e.g., separate wild horse, livestock, and wildlife impacts) and if monitoring shows any adverse impacts, take action to manage the activity based on the specific results in the monitoring.
15. Once excess horses are removed from areas where livestock grazing permittees have taken reductions in AUMS, livestock grazing reductions should be reinstated as soon as resources recover.
16. Any equine animal released from private individuals, tribes, or neighboring lands onto federal public lands after 1971 should be considered as stray and be removed.
17. Develop monitoring programs that separate the utilization by species (e.g., wild horse, livestock, or wildlife) that can be used to inform management.

Should on-the-ground conditions change and necessitate an adjustment to the actions taken by the BLM, Mesa County request that a new EA be released for public review and input before any further action is taken by the BLM.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Cody Davis", with a long horizontal flourish extending to the right.

Cody Davis
Mesa County Commissioner – District 1

CC: Mesa County Board of County Commissioners
Peter Baier, Mesa County Administrator
Todd Starr, Mesa County Attorney
Mesa County Administration