



1301 Pennsylvania Ave. NW, Suite 300 • Washington, D.C. 20004

Public Lands Council

January 27, 2011

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

RE: BLM Statement Regarding Saving America's Mustangs Foundation Prospectus

Dear Director Abbey:

As representatives of federal lands ranchers across the west, the Public Lands Council (PLC) would like to express our appreciation for the Bureau of Land Management's (BLM) January 24, 2011 statement regarding the prospectus submitted by Saving America's Mustangs Foundation (the Foundation) to build and establish an eco-sanctuary for wild horses. We share many of the concerns outlined in the BLM's statement and believe a more sustainable, sensible solution for wild horse management can and should be found.

We agree with the BLM's statement that "Existing law would need to be changed" to accommodate the Foundation's proposal. Throughout the BLM and Foundation discussions, PLC has made clear our opposition to any future agreement that would include increasing any herd management area (HMA) or inflating appropriate management levels (AMLs) beyond what the resource can sustain. Expansion of HMAs to new areas would require an amendment to the Free-Roaming Wild Horse & Burro Act of 1971 and would pose a threat to multiple-use on public lands. Converting livestock Animal Unit Months (AUMs) or livestock grazing permits to single-use horse permits or sanctuaries for wild horses would also violate the Taylor Grazing Act of 1934, thereby jeopardizing our members' grazing permits and presenting opportunities for anti-grazing interests to push for more conversion of livestock allotments to other single-uses. We continue to support the multiple use management of our Nation's public lands.

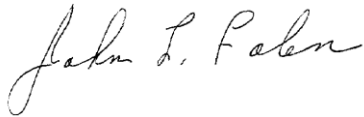
Like the BLM, we question elements of the proposed eco-sanctuary, such as whether and how title of the wild horses would be transferred to the Foundation; the cost effectiveness of the Foundation's proposed \$500 stipend per horse, per year, for the life of each animal; and whether the range would be capable of sustaining the 10,000 horses proposed. We also question the accuracy of some of the claims made by the Foundation and Madeleine Pickens herself, such as the mistaken statement that only 30,000 horses exist on public lands, or the statement that "[The cattlemen] got the BLM land attached to their ranches with sweetheart deals," a clear lack of understanding or outright falsification of the history of livestock grazing permits on public lands and the careful management required to hold those permits.

Undoubtedly, the problem of wild horse overpopulation poses a threat not only to the health of the range, the rural economies and the families making a living off the land but to the horses themselves. However, we strongly oppose and do not believe the problem can be solved by expanding HMAs or converting livestock grazing permits.

We must use science and research to find new, effective ways of decreasing the reproduction rate of the entire herd. This will help keep the herds healthy and help match the rate of reproduction with the rate of adoption and sale—which would render unnecessary the need for private pasturing. Such solutions have traction in Congress and are authorized by current statute. They would bring much-needed relief to public lands ranchers, who, since enactment of the Free-Roaming Wild Horse & Burro Act in 1971, have seen grazing on BLM lands reduced by as much as 50% while the horse population increased by 44%.

We thank you for your thoughtful response to the Foundation's proposal, and offer our ideas and support as you seek to improve the wild horse and burro program, for the sake of federal lands ranching, rangeland health, rural economies, and the horses themselves. We encourage you to continue consulting local and county governments, state grazing associations, and national livestock groups as you go forward with planning and implementation of the program.

Sincerely,

A handwritten signature in cursive script that reads "John L. Falen". The signature is written in dark ink and is positioned above the typed name.

John Falen
President
Public Lands Council