



UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
LITTLE SNAKE RESOURCE AREA
455 EMERSON STREET
CRAIG, COLORADO 81625



In Reply Refer To:
CO-100
1610;4700

September 1, 2005

Dear Interested Party,

This letter addresses two comments voiced at the July 21, 2005 Northwest Colorado Stewardship (NWCOS) subcommittee meeting concerning management of wild horses in the revised Little Snake Resource Management Plan (RMP). Some meeting attendees asked that LSFO consider opening the Douglas Mountain Herd Area (HA) to wild horse management. In addition, some attendees stated that the Sand Wash Herd Management Area (HMA) was originally mapped to extend north to the Wyoming state line.

Members of my staff researched the closure of the Douglas Mountain Herd Area and reread previous LSFO planning documents to note any changes to the Sand Wash HMA boundary. My staff concluded that the reasoning for closure of the Douglas Mountain herd remains solid.

The Douglas Mountain HA is discussed in the 1977 Vermillion Planning Area Management Framework Plan (MFP). The MFP is available to the public at the Little Snake Field Office. The document recognized that wild horses inhabited two locations within the Vermillion Planning Unit: Douglas Mountain and Sand Wash Basin. The document outlined avenues through which the public was encouraged to participate in the planning process to determine where wild horse herds could be managed in the spirit of the 1971 Act. The MFP documented the inter-agency coordination pursued during the MFP wild horse management planning process.

The MFP identified that wild horses would be managed in Sand Wash Basin and that all horses would be removed from the Douglas Mountain Herd Area. The decision to close Douglas Mountain from active wild horse management was based on the following conflicts:

1. 31,200 acres of the 108,161 acres encompassing the Douglas Mountain Herd Area were under ownership of the National Park Service's (NPS) Dinosaur National Monument. The NPS considered wild horses feral animals, and therefore not part of the natural ecosystem. The NPS requested removal of all wild (feral) horses from NPS.
2. 10,524 of the Douglas Mountain HA acres were owned by private landowners who repeatedly requested removal of the wild horses from their land.
3. The private lands contained the majority of dependable water sources relied upon by

the wild horse herd.

4. Fencing the private land from wild horse use would negatively impact the wild horse habitat by limiting water and forage availability.
5. Managing a herd of wild horses on the Douglas Mountain HA would require AUM reductions on the livestock permittees to the point that operators would be put out of business.
6. The Division of Wildlife recommended removal of the herd in an effort to reestablish the deer herd and to encourage the expansion of bighorn sheep back onto their historic range.

Page 12 of the MFP makes the following observation:

Further analysis of the Act identifies that 'all management activities shall be at the minimal feasible level and shall be carried out in consultation with the wildlife agency of the State...' The Douglas Mountain area does not lend itself to minimal management due to the problems with Dinosaur National Monument policy, land ownership pattern, access, topography, available water, wildlife planning (State Agency) and present range conditions. Colorado Division of Wildlife has been consulted on the wild horse problem, and they have recommended removal of all horses from Douglas Mountain in an effort to reestablish a vanishing deer herd and to encourage expansion of the bighorn sheep back onto its historical range.

Having reviewed the basis for the decision reached in the 1977 Vermillion Planning Area Summary and after talking with my staff who further researched reasoning for the closure, I believe the decision to close Douglas Mountain from active wild horse management remains valid.

Regarding the second issue, my staff reported finding no maps or written documentation of the Sand Wash HMA, or Herd Area with different boundaries than are currently managed. The 1977 Vermillion Planning Area MFP identified that the Sand Wash HMA encompassed 157,730 acres of public (154,930), private (840) and state lands (1,960). This same acreage figure was carried forward in the 1982 Sand Wash Basin Herd Management Area Plan (HMAP). Neither the 1977 MFP nor the 1982 HMAP recognized wild horse habitat, or the Sand Wash herd, as extending north to the Wyoming state line. The HMAP does discuss the immigration/emigration of horses from Wyoming. Page 14 of the HMAP states:

In the past, Sand Wash basin sometimes received an influx of wild horses migrating from Wyoming in a manner similar to antelope herds. The resident (Sand Wash) herd would vary considerably depending on how many of these horses actually left again in the spring.

Page 13 of the HMAP further notes:

Since the 1979 wild horse gather, the wild horse numbers have been dropping gradually to the current count of 125. The drop in numbers can be partially attributed to the loss of migratory horses which have worked their way through broken fences or open gates

along the northern border.

Having reviewed the 1977 Vermillion MFP and the 1982 Sand Wash Basin HMAP, I see no indication that the Sand Wash Herd Area, or Herd Management Area ever extended north to the Wyoming state line, or that the boundaries of the HMA have changed since initial public recognition and documentation in the 1977 Vermillion Planning Area MFP. For this reason I do not concur with the request to include enlarging the Sand Wash HMA north to the Wyoming state line.

I appreciate the attendance at the July 21, 2005 wild horse NWCOS meeting and encourage participants at that meeting to remain active throughout the remainder of the RMP revision process. Please contact my wild horse specialist Valerie Dobrich at 970-878-3839 with questions directly relating to wild horse management and my planning coordinator Jeremy Casterson at 970-826-5071 for all questions associated with the RMP planning process. We look forward to continuing to work with each of you.

Sincerely,

John E. Husband
Field Office Manager