

Jakes Wash & Moriah HMA
Craigs Comments

July 10th, 2007 A.D.

Mr. William E. Dunn William_E_Dunn@blm.gov
Bureau of Land Management, Ely District Office
775 N. Industrial Way, HC33, Box 33500, Ely, NV 89301-9408
Re: EA# NV-040-07-002: Jakes Wash & Moriah HMA Capture Plan

Dear Mr. Williams:

Your plan for the Jakes Wash and Moriah HMA is grossly unfair, both to the wild horses in the wild and to the substantial public who support them living in their free and natural state and who wish to see the Wild Horse Act upheld by their public servants. Your proposal to jerk out 150 wild horses by helicopter roundup, at the cost of great suffering and social and ecological disruption, and to leave only 30-40 wild horses in this extensive area of 208,000 acres constitutes an abrogation of the above Act. Consider: the wild horses in their legal herd areas are to be treated respectfully as the "principal" presences according to the law, but you are proposing all the opposite! The number of wild horses you leave will represent less than one horse per 5,000 acres of legal HMA! This is grossly unfair, unjust, and contrary to the law, including NEPA and the Multiple Use Act! You also fail to consider the place of the horse in the native Western ecosystem as a "returned native species" who restores and enhances such.

The present wild horse population of slightly less than 200 represents about one wild horse per 1,000 acres of HMA. This is a very sparsely distributed population! What I would like to know is just what interests you are catering to here in this legal wild horse herd area? Are livestock and/or big game animals again being allowed to squeeze the wild horses out, even in their legal herd areas? From your figures, it appears you are allocating over 30 times more forage to livestock than to wild horses here in the legal domain of the horses! And what is the extension and location of the original herd area here vis a vis the hma? Are you planning on leaving mainly old horses and on sterilizing the mares with PZP? Are you doing anything to secure year-round water and unfenced seasonal migratory routes for this wild horse population? Are you incorporating natural barriers and other intrinsic factors into your management plan to allow the wild horse population to stabilize its own numbers over time? This is what you should be doing! It seems to me that you are managing for the extinction of this herd, planning for your own self-fulfilling prophecy of wild horse elimination from the wild, by setting them up for inbreeding and chance die-out.

Please revise this atrocious anti-mustang plan. It is not too late for these wild horses, but will be under your plan to set them up by cutting them down to non viable levels! You also fail to recognize the great service these wild horses perform by reducing flammable vegetation, particularly important with the increasing aridity the West is experiencing. In other words, these wild horses are great fire preventers. Also they are great seeders and soil builders through their feces. RSVP.

Sincerely,

Craig C. Downer,
Wildlife Ecologist
P.O. Box 456,
Minden, NV 89423