

Craigs Input/Comments to NWHR Scoping Period

August 4th, 2007

Bureau of Land Management
Las Vegas Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130
Re: 4700 (NV052)

Attn: Lisa Christianson, Acting Field Manager, Recreation and Renewable Resources &
Jerri Bertola, Wild Horse & Burro Specialist. Tel. (702) 515-5024 &
LVFO Manager

Dear Mame/Sir:

As per letter from Christenson of 7/11/07, please keep me on your mailing list for receiving wild horse and burro information, wilderness and wildlife, grazing allotment, and other activities involving the many values and presences of our public lands. As concerns the roundup of 178 wild horses conducted between July 6th and 8th, 2007, on the eastern side of the Nevada Wild Horse Range (NWHR) and the proposed gather of an additional 800 to 850 so called "excess" wild horses from the NWHR in December of the present year, I strongly object to the further reduction of this at present minimally viable herd! By taking the population down to 300, the lower end of your Appropriate Management Level (AML) of 300-500 wild horses, you will jeopardize the natural adaptability and resilience of the herd!

A given population of wild animals derives an adaptive benefit from more generational lineages in adaptive ascent to the present. Also a population has a way of mutualistically conditioning its habitat; and this is particularly true in the case of the wild horses who seed many of the native plants they eat and whose feces contribute significantly to the humus component of soils, lending vital plant nutrients and water retaining qualities to such.

I consider it a glaring oversight that you have established such a very low AML for the NWHR! This vast area used to be home to several thousand wild horses. To reduce the herd to merely 300-500 animals is a gross injustice! This, of all places, should be a herd area that supports an optimally viable wild horse population numbering in the thousands, not just a minimally viable one. And I would professionally argue that 300-500 does not even meet the latter standard. I believe that the BLM is abrogating its responsibility under the law to defend and promote the rights of the wild horses in their largest legal herd area in the nation! According to the BLM Wild Horse and Burro Evaluation of January 29, 1997: "Nevada's only designated wild horse range is within the Nellis Air Force Base. Established in 1962, the Nevada Wild Horse Range (Range) covers 394,000 acres out of the 2,209,326 acre Air Force Base. While the majority of the wild horses occupy lands outside of the Range, BLM's agreements with the Air Force only allow for managing horses within the Range. ... In 1990-1991, BLM conducted an environmental assessment of the Nevada Wild Horse Range for wild horse suitability using water, distribution of animals and forage utilization as criteria. Based upon this assessment and an agreement with the Air Force, the appropriate management level for the Range was determined to be 1,000 horses. At the time of the assessment there were approximately 5,000 horses on the Range." – So just why is the current AML now set at 300-500 wild horses, more than a halving of the earlier recommended AML, itself a great reduction of the former population?! Another publication of the BLM called Nevada Wild Horse Range, Clark, Lincoln, and Nye Counties, Nevada states "Permanent water sources consist of springs found at the base of the mountains and the temporary standing water in the playa lakes. ... playas can hold rainfall runoff for several weeks and furnish an added source of water for the horses and wildlife found in the area." It seems to me that a lot more could be done to assure that the wild horses have adequate water to support an optimally sized wild horse population, one viable in the long-term and capable of really thriving in this vast area! The present AML of 300-500 is not an optimally viable herd; indeed, it may not even be a minimally viable herd, especially given the harem social structure of many of the wild horse bands, with one stallion, the "patron", doing the majority of the breeding, and hence limiting

genetic intergenerational exchange. BLM's reliance upon only one geneticist to determine that a minimally viable population consists of only 150 wild horses is another glaring proof of its negative tendentiousness toward the wild horses in the wild!

Also noted in Nevada Wild Horse Range, Clark, Lincoln, and Nye Counties, Nevada: "The horses share the area with pronghorn antelope, desert mule deer, coyotes, fox and mountain lions, as well as many species of small wildlife." Not noted however is the impact the mountain lions have upon reducing the wild horse population, which can be a very significant one!

I am requesting a breakdown of the total legal acreage of the NWHR and surrounding legal herd areas. Leaving only 300 wild horses in the core NWHR works out to leaving 1,313 acres per remaining wild horse. If the bigger Nellis AFB is considered this works out to 7,364 acres per remaining wild horse. I am also requesting a breakdown and description of: (1) the water sources to which the wild horses are entitled and how this compares with all existing water sources in and around the NWHR, (2) the fences presently existing within the refuge and how these might disrupt the seasonal wild horse migratory patterns and impede their access to water, and (3) other grazers and browsers present in the NWHR, including livestock and big game animals that would allow a fair appraisal of the relative proportions of resources which the wild horses are actually receiving vis-a-vis livestock, big game, and other uses going on within this our nation's greatest wild horse sanctuary!

Having earlier toured NWHR during the early 1980's, I remember how certain springs were maintained in collaboration with wild horse groups (such as the National Wild Horse Organization, as I recall, in Las Vegas) and that an optimally viable herd was then present and in good shape. This herd was over 2,000, as I remember. I also remember the reports of a huge die-off during a drought period in which a rescue effort turned out to be a very tragic affair with hundreds of horses dying. I have also heard how the wild horses were "set up" for this tragedy by their enemies' preempting their waters and overly restricting their movement patterns to which they were guaranteed under the Act.

As a wildlife ecologist with instruction in wildlife management and ecology and population biology, I know there is a way of providing for the needs of a much more substantial and truly viable number of wild horses than the AML of 300-500 here in their greatest legal public lands sanctuary, the NWHR! What seems to be lacking is the political will to assure an intelligent and positive wild horse-containing sanctuary design that allows for a viable wild horse population in the thousands here, not the low hundreds. So many of the other legal herd areas have been zeroed out across the nation or reduced to such ridiculously low AML's as to assure the inbreeding and chance die-out of remaining wild horses, especially when coupled with the use of PZP that more or less sterilizes the remaining mares. In regard to the proposed use of PZP on remaining mares allowed to remain in the NWHR, I am very much opposed to this as it will reduce the natural herd vitality and resilience, further contributing to the herd's decline. This would, indeed, be adding insult to injury by so negating the ability to reproduce among those relatively few remaining wild equids!

I am a strong advocate of alternative approaches to wild horse management, approaches that are true to the original spirit and intent of the Wild Free-Roaming Horse and Burro Act in being minimally invasive. These are approaches that respect the wild horse-containing ecosystem and allow the natural cycles to operate, including that most natural cycle involving birth and death and the contribution that the wild horse makes as a prey or scavenged species. What more fitting end than to contribute one's mortal remains to the ecosystem that has supported one since birth?! The wild horses space their bands in mosaic fashion filling up their niche space at any given period of time, through a type of personal band space largely governed by the stallion. Once they have spaced out their available habitat, then they stabilize their population numbers as a member of the climax ecological sere. For this reason, they are called "climax" species, something I learned in graduate courses in wildlife management and population biology. Now the key point for allowing any given wild horse population to stabilize is: where and how do we so design a wild horse-containing sanctuary in regard to its natural or semi-permeable artificial boundaries that would act as barriers to the wild horses' expansion. It is absolutely of critical concern that we identify wild horse or burro habitats that are of sufficient size and of appropriate floral and faunal composition, as well as elevational range so as to provide all the needs for a long-term viable wild equid population numbering

in the thousands. This, of all places, should be the Nevada Wild Horse Range established many years ago by government decree and in accordance with the general will and advocacy for wild horses in the wild by the public. The “why?” of this situation is that we owe it to this returned North American native: the horse (*Equus caballus*) whose presence restores the North American ecosystem and who deserves to live freely and naturally here for myriad benign and just reasons, including those that pertain purely to horse kind itself!

This now brings us to the question of “when?” this design must be carefully thought out, proposed and implemented. The time is clearly NOW!, because the wild horses cannot wait another year! There must be a turnaround for them as a truly returned native wildlife species here in their legal herd areas. They must be restored to viable numbers, not continue to be “sold down the river” to crippling low population numbers and finally to elimination from the wild, as is currently the case! Our public servants must take their responsibility to them seriously and stop siding with the wild horses’ shameless detractors and out-and-out, shameless, unreasonable and in-your-face enemies! This is the sacred duty of our chosen public servants in the BLM and USFS, the two agencies chosen by the people to guard our nation’s last wild horses: to defend all the values and presences on the vast public lands, and to prevent any subset of vested interests, such as livestock, hunting, mining, timber, housing development, ORV’ers, etc., from monopolizing these public lands and upsetting the very sane balance in their biodiverse ecosystem. – I therefore strongly urge you to be true to your – what I consider to be – sacred duty toward these wild horses.

Please reconsider your proposal to remove 800-850 wild horses from the NWHR! This is grossly unfair and unnecessary and further plays into the hands of the wild horses’ crass enemies, those whose conscience is seared when it comes to these beautiful, adaptable, and ecologically positive “Returned North American Natives” of ancient origin and long-standing ancestral duration here! Not a single wild horse should be further removed, but you should assure that their natural grazing, water, mineral, etc., supplies are not monopolized by their enemies, especially the ranchers and big game hunter establishment! Please let me know what I can do as a wildlife ecologist to make this most just dream a living reality here in my home state of Nevada.

Sincerely yours,

Craig C. Downer
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