

May 29, 2008

Patrick Putnam, Assistant Field Manager
Bureau of Land Management
Las Vegas Field Office
4701 North Torrey Pines Drive
Las Vegas, Nevada 89130-2301

Subject: Nevada Wild Horse Range Herd Management Area Plan EA

Dear Mr. Putnam:

The Commission for the Preservation of Wild Horses appreciates the opportunity to review and comment on the preliminary environmental assessment for the Nellis Range. Wild horses within the Air Force holdings of the Nellis Range have been subject to the extreme environmental conditions of the Mojave Desert. It has been our observation that populations witness the bust and boom cycles dependent on precipitation patterns over time which presents extreme management challenges consistent with ephemeral ranges.

As a management plan, the text or appendix should include the factors and computations of the determined appropriate management level. This number should be portrayed as dynamic and dependent of habitat monitoring studies necessary to protect forage and water sources.

Over the past 20 years, the scheduled and emergency gathers should have provided the Bureau significant composition and genetic data to prescribe the future herd dynamics and objectives. Existing herd composition, age structure, sex ratios and genetics may be a result of random gathers and natural factors which may or may not have resulted in a natural and thriving herd.

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Herd area suitability can be an element of a Resource Management Plan or an element of this herd plan. As disclosed in the draft, a major portion of the delineated herd area does not have permanent water sources. In fact, the data suggests that about a third of the present herd area supports water, forage and cover suitable for the herd. This matter needs better definition in the document and justification to support the appropriate management level.

Social behavior of wild horse bands may be significantly altered with management actions that increase male ratios to mares or geldings by future gathers. While population

controls are needed to reduce costs, the actions proposed will create many unknown impacts to the welfare of the herd.

As you are aware, at the recent meeting of the Nevada Wild Horse Commission, the Commissioners voted against gelding of stallions and returning them to the HMA on Nellis. This was discussed at multiple meetings and in general the Commission was still interested in the concept but there are so many unknown impacts that the Commissioners and this office would like to see this investigated much more intensely than just to implement on a range with the challenges that Nellis promises.

Initial gelding proposals should be implemented as “studies”, to be monitored for impacts to the horses and their social structure. On February 19, 2008, the Commission sent a letter to Mr. Ron Wenker, Director, Nevada BLM, expressing our concerns for any gelding proposal in Nevada and asking that these concerns be investigated thoroughly prior to any suggestion of implemented actions in Nevada. We have still to receive an answer to that letter thoroughly assessing each of the concerns. If gelding of stallions to be introduced back to the HMA is considered in any HMA’s, these issues should be thoroughly analyzed prior to any implementation. (see attached)

Also, since the late 80’s, typically Nellis has been gathered in December of each year due to military activities. Prior to that, Nellis was always gathered using the water trapping method in the summer months. Isn’t water trapping much less expensive and less stressful on the horses than helicopter gathers in December which also poses extreme weather challenges? Why was there a decision to change? We realize it is easier on the military in December but prior to this, they always accommodated summer gathers. Dr. Mike Kirk, our Chairman, had been asked by BLM for his professional opinion regarding the gelding project on Nellis. He was not asked his opinion as to “if” this action should take place, only his medical opinion. As you can see, in addition to his other comments that make this prohibitive, “the procedure is best performed in the spring or early summer prior to fly season.” This would definitely negate doing this procedure in December of any year when Nellis is so brutally cold according to professional medical opinion. (see attached)

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Additionally, in the past years, the Commission has recommended that the BLM investigate the feasibility of making Nellis a non breeding population. We still wish to see that considered. With the unsure future of funding and sanctuary availability, the BLM should consider all options and possibly a “sanctuary” situation on Nellis. This could benefit the program by providing a place for non breeding mustangs to live out their lives as free roaming wild horses and at much lesser cost than the holding costs of current privately contracted sanctuaries. The horses could then be monitored for population size in concert with the habitat and additional animals placed there as attrition

reduces the population numbers. This will also help to reduce conflicts with military operations as gathers would be reduced if not eliminated altogether.

We encourage the Field Office to amend the present document to include necessary parameters and data to better define the future management of this herd. Given the extreme ephemeral nature of the range and population crashes that are now ongoing and observed in the past, the plan needs to fully address these matters.

Sincerely,

CATHERINE BARCOMB
Administrator