

Bureau of Land Management
Surprise Field Office
Steve Surian
P.O. Box 460
Cedarville, CA 96104

October 10, 2007

RE: 4700 (CA 370) (P)
Scoping Period for Proposed Management Plans of Wild Horses and Burros in
Buckhorn, Carter Reservoir and Massacre Lakes Herd Management Areas

Dear Mr. Surian:

Enclosed are my comments, input, questions and concerns regarding the proposed actions of wild horse and burro management for the Buckhorn, Carter Reservoir and Massacre Lakes Herd Management Areas.

Please continue to keep me on the Interested Party list in all management actions concerning the wild horses and burros and their HMAs administered by the Surprise Field Office.

Due to the fact that the Surprise Field Office is expected to publish the Preliminary Environmental Assessment to reaffirm or adjust the Appropriate Management Levels for the Massacre Lakes HMA in just a few weeks, please also provide a copy of the Resource Management Plan/Land Use Plan that establishes BLMs policies and framework for the Massacre Lakes wild horse management in the HMA at the address below.

Thank you for the opportunity to participate in the management and preservation of our Nations resources.

Sincerely,

NAME/ADDRESS REMOVED

I would appreciate the following information included in the documents entitled Environmental Assessments and questions addressed for the proposed management plans.

Buckhorn Herd Management Area.

What is the total acreage of the Tuledad Grazing Allotment?

What is the total acreage of the Tuledad Grazing Allotment that falls within the Buckhorn HMA boundaries?

What is the total Animal Unit Months authorized for the Tuledad Grazing Allotment?

What is the total number of livestock authorized annually in the Tuledad Grazing Allotment?

What is the authorized season of use?

Who is the permittee (s) for the Tuledad Grazing Allotment and when was the permit last renewed?

Are there any other grazing allotments that affect the Buckhorn HMA and if so, please provide the same specific information requested for the Tuledad Grazing Allotment.

Are there any proposed Range Improvement Projects within the Buckhorn HMA including fencing proposals and water developments?

What is the amount of miles of fencing placed throughout the Buckhorn HMA?

What is the Nevada Department of Wildlife's Unit Number (s) for wildlife management within the Buckhorn HMA?

What are the 2007 estimated populations of these species of wildlife found within the Buckhorn HMA: mule deer, pronghorn antelope, elk, and big horn sheep?

What are the authorized AUMs and population objectives for these big game species within the Buckhorn HMA so as to examine the thriving ecological balance being managed?

What are the histories and known populations of wildlife occurring within the Buckhorn HMA for mule deer, pronghorn antelope, elk and big horn sheep?

Are there any plans to introduce new species of fish or wildlife to the Buckhorn HMA?

Please provide a complete list of water sources within the Buckhorn HMA including riparian areas and whether they have been fenced, livestock water developments, big game water developments, current flow rates since these may be effected by recent drought conditions and

the latest water quality data to indicate if wild horse use is excessive within the HMA at current populations.

Please provide current photos of *all* natural water sources within the Buckhorn HMA, not just a select few, photos of wild horses to indicate their current body condition, photos of livestock grazing within the authorized allotments and photos of vegetation utilizations throughout the Buckhorn HMA to clearly illustrate wild horse impacts to rangeland resources and how BLM determines wild horse use versus livestock and big game use in the areas.

Please include the dates of all monitoring information offered within the EA that establish wild horse use on HMA resources. Since it has been four years since any rangeland data was released to the public for review, AMLs may need to be evaluated based on data collected since the 2003 removals. Please avoid general descriptions such as “recent” and provide specific dates, reports, measurements, vegetative conditions, and water analysis.

Please provide a complete copy of the current guiding Resource Management Plan/Land Use Plan Section on Wild Horse and Burro management in the Buckhorn HMA.

Please provide a complete removal history of the Massacre Lakes HMA including years wild horses were removed including emergency roundups, number of wild horses and burros taken, gender ratios of those returned to the HMA, and estimated remaining wild horse populations after the removal operations were complete.

Please provide information, statistics and data compiled regarding the experimental use of the fertility control drug PZP on wild populations, noted impacts, reproduction rates, unexpected results, birth defects, impacts to stallions regarding continuous estrus cycles causing repetitive mating behaviors and challenges to herd dynamics, noted differences in impacts to different age classes of mares, etc.

Please provide specific limits on distance wild horses will be driven during capture operations if helicopters are used to conduct wild horse removals. Also include limits on climactic conditions such as extreme temperatures (such as wild horses will not be driving if temperatures exceed 100 degrees or fall below 40 F).

If drought conditions are present during removal operations, please include how BLM plans to prevent the excessive dust stirred up by helicopter driving and wild horse concentrations in capture pens that resulted in the respiratory conditions and pneumonia related deaths of several wild horses at the Palomino Valley Holding Facility in Nevada last month.

Please provide detailed information on alternative trap sites for use in lure trap capture options for wild horse populations as there is a great deal of evidence that this form of capture is significantly more humane and less traumatic, both physically and mentally to wild horse and burro populations.

If BLM believes this form of capture option is not feasible within the HMA, please provide specifics and a detailed description of why BLM believes they cannot utilize a more humane capture and removal method for wild horse populations.

If using the Jenkins Population Modeling Program to justify wild horse management actions, please include all parameters entered into the program as the software program allows a wide variety of input to conduct test runs – without reporting what input was used to run the tests, the information becomes useless for analysis. Also, please make sure that the current estimated wild populations are used within all trial runs versus random numbers of wild horses and reproduction rates.

Please include a projected cost analysis of the proposed project including fees paid to hired contractors.

The continued contracting of Cattoor Livestock Roundups, Inc. is vehemently opposed due to a long history of questionable adherence to Standard Operating Procedures, guilty pleas to inappropriate uses of aircraft to capture wild horses and blatant and documented disregard for humane handling procedures of wild horses and burros during capture operations.

BLM National Herd Statistics report wild horses were removed in November 2003 with a post-gather population being reported of 61 wild horses. Between 2005 and 2006 BLM then reported a stunning leap in population estimates occurring in the Buckhorn HMA, jumping from 71 wild horses in 2005 to 239 wild horses.

Please address how the Surprise Field Office reported such a low post-gather population after the 2003 removals and why BLM believes wild horse populations skyrocketed in the area between 2005 and 2006.

Carter Reservoir Herd Management Area

What is the total acreage of the Sand Creek and Crooks Lake Grazing Allotments?

What is the total acreage of the Sand Creek and Crooks Lake Grazing Allotments that falls within the Carter Reservoir HMA boundaries?

What is the total Animal Unit Months authorized for the Sand Creek and Crooks Lake Grazing Allotments?

What is the total number of livestock authorized annually in the Sand Creek and Crook Lake Grazing Allotments?

What are their authorized seasons of use?

Who is the permittee (s) for the Sand Creek and Crooks Lake Grazing Allotments and when were their permits last renewed?

Are there any other grazing allotments that affect the Carter Reservoir HMA and if so, please provide the same specific information requested for the Sand Creek and Crooks Grazing Allotments.

Are there any proposed Range Improvement Projects within the Carter Reservoir HMA including fencing proposals and water developments?

What is the amount of miles of fencing placed throughout the Carter Reservoir HMA?

What is the Nevada Department of Wildlife's Unit Number (s) for wildlife management within the Carter Reservoir HMA?

What are the 2007 estimated populations of these species of wildlife found within the Carter Reservoir HMA: mule deer, pronghorn antelope, elk, and big horn sheep?

What are the authorized AUMs and population objectives for these big game species within the Carter Reservoir HMA so as to examine the thriving ecological balance being managed?

What are the histories and known populations of wildlife occurring within the Carter Reservoir HMA for mule deer, pronghorn antelope, elk and big horn sheep?

Are there any plans to introduce new species of fish or wildlife to the Carter Reservoir HMA?

Please include the dates of all monitoring information offered within the EA that establish wild horse use on HMA resources. Since it has been four years since any rangeland data was released to the public for review, AMLs may need to be evaluated based on data collected since the 2003 removals. Please avoid general descriptions such as “recent” and provide specific dates, reports, measurements, vegetative conditions, and water analysis.

Please provide a complete list of water sources within the Carter Reservoir HMA including riparian areas and whether they have been fenced, livestock water developments, big game water developments, current flow rates since these may be effected by recent drought conditions and the latest water quality data to indicate if wild horse use is excessive within the HMA at current populations.

Please provide current photos of *all* natural water sources within the Carter Reservoir HMA, not just a select few, photos of wild horses to indicate their current body condition, photos of livestock grazing within the authorized allotments and photos of vegetation utilizations throughout the Carter Reservoir HMA to clearly illustrate wild horse impacts to rangeland resources and how BLM determines wild horse use versus livestock and big game use in the areas.

Please provide a complete copy of the current guiding Resource Management Plan/Land Use Plan Section on Wild Horse and Burro management in the Carter Reservoir HMA.

Please provide a complete removal history of the Carter Reservoir HMA including years wild horses were removed including emergency roundups, number of wild horses and burros taken, gender ratios of those returned to the HMA, if mares were treated with fertility control and estimated remaining wild horse populations after the removal operations were complete.

Please provide information, statistics and data compiled regarding the experimental use of the fertility control drug PZP on wild populations, noted impacts, reproduction rates, unexpected results, birth defects, impacts to stallions regarding continuous estrus cycles causing repetitive mating behaviors and challenges to herd dynamics, noted differences in impacts to different age classes of mares, etc.

Please provide specific limits on distance wild horses will be driven during capture operations if helicopters are used to conduct wild horse removals. Also include limits on climactic conditions such as extreme temperatures (such as wild horses will not be driving if temperatures exceed 100 degrees or fall below 40 F).

If drought conditions are present during removal operations, please include how BLM plans to prevent the excessive dust stirred up by helicopter driving and wild horse concentrations in capture pens that resulted in the respiratory conditions and pneumonia related deaths of several wild horses at the Palomino Valley Holding Facility in Nevada last month.

Please provide detailed information on alternative trap sites for use in lure trap capture options for wild horse populations as there is a great deal of evidence that this form of capture is significantly more humane and less traumatic, both physically and mentally to wild horse and burro populations.

If BLM believes this form of capture option is not feasible within the HMA, please provide specifics and a detailed description of why BLM believes they cannot utilize a more humane capture and removal method for wild horse populations.

If using the Jenkins Population Modeling Program to justify wild horse management actions, please include all parameters entered into the program as the software program allows a wide variety of input to conduct test runs – without reporting what input was used to run the tests, the information becomes useless for analysis. Also, please make sure that the current estimated wild populations are used within all trial runs versus random numbers of wild horses and reproduction rates.

Please include a projected cost analysis of the proposed project including fees paid to hired contractors.

The continued contracting of Cattoor Livestock Roundups, Inc. is vehemently opposed due to a long history of questionable adherence to Standard Operating Procedures, guilty pleas to inappropriate uses of aircraft to capture wild horses and blatant and documented disregard for humane handling procedures of wild horses and burros during capture operations.

BLM National Herd Statistics report wild horses were removed in November 2003 with a post-gather population being reported of 25 wild horses. Between 2005 and 2006 BLM then reported a stunning leap in population estimates occurring in the Buckhorn HMA, jumping from 29 wild horses in 2005 to 95 wild horses.

Please address how the Surprise Field Office reported such a low post-gather population after the 2003 removals and why BLM believes wild horse populations skyrocketed in the area between 2005 and 2006.

Massacre Lakes Herd Management Area

What is the total acreage of the Massacre Lakes Grazing Allotments?

What is the total acreage of the Massacre Lakes Grazing Allotments that falls within the Massacre Lakes HMA boundaries?

What is the total Animal Unit Months authorized for the Massacre Lakes Grazing Allotments?

What is the total number of livestock authorized annually in the Massacre Lakes Grazing Allotments?

What are their authorized seasons of use?

Who is the permittee (s) for the Massacre Lakes Grazing Allotments and when were their permits last renewed?

Are there any other grazing allotments that affect the Massacre Lakes HMA and if so, please provide the same specific information requested for the Massacre Grazing Allotments.

Are there any proposed Range Improvement Projects within the Massacre Lakes HMA including fencing proposals and water developments?

What is the amount of miles of fencing placed throughout the Massacre Lakes HMA?

What is the Nevada Department of Wildlife's Unit Number (s) for wildlife management within the Massacre Lakes HMA?

What are the 2007 estimated populations of these species of wildlife found within the Massacre Lakes HMA: mule deer, pronghorn antelope, elk, and big horn sheep?

What are the authorized AUMs and population objectives for these big game species within the Massacre Lakes HMA so as to examine the thriving ecological balance being managed?

What are the histories and known populations of wildlife occurring within the Massacre Lakes HMA for mule deer, pronghorn antelope, elk and big horn sheep?

Are there any plans to introduce new species of fish or wildlife to the Massacre Lakes HMA?

Please provide a complete list of water sources within the Massacre Lake HMA including riparian areas and whether they have been fenced, livestock water developments, big game water developments, current flow rates since these may be effected by recent drought conditions and the latest water quality data to indicate if wild horse use is excessive within the HMA at current populations.

Please provide current photos of *all* natural water sources within the Massacre Lakes HMA, not just a select few, photos of wild horses to indicate their current body condition, photos of livestock grazing within the authorized allotments and photos of vegetation utilizations throughout the Massacre Lakes HMA to clearly illustrate wild horse impacts to rangeland resources and how BLM determines wild horse use versus livestock and big game use in the areas.

Please include the dates of all monitoring information offered within the EA that establish wild horse use on HMA resources. Please avoid general descriptions such as “recent” and provide specific dates, reports, measurements, vegetative conditions, and water analysis.

Please indicate forage availability within the HMA by citing pounds per acre of vegetative resources available. Also include total gallons of water available within the HMA for wild horse and burro use.

Please provide a complete copy of the current guiding Resource Management Plan/Land Use Plan Section on Wild Horse and Burro management in the Massacre Lakes HMA.

Please provide a complete removal history of the Massacre Lakes HMA including years wild horses were removed including emergency roundups, number of wild horses and burros taken, gender ratios of those returned to the HMA, if mares were treated with fertility control and estimated remaining wild horse populations after the removal operations were complete.

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BLM National Herd Statistics report the last time wild horses were officially removed from the Massacre Lakes HMA was in October 1988. How have wild horse populations and reproduction rates stayed so low?

At the reproduction rates BLM regularly recites for wild horses and burros, wild populations have been reproducing at an annual rate of 15-20% or more. Wouldn't wild horse populations be in the hundreds, if not thousands by now with no removals for 15 years? Please explain.

According to the National Program Offices Fiscal Year 2004 Herd Statistics for the Massacre Lakes HMA, the originally designated Herd Area as identified by BLM in 1971 spanned 115,937 public acres and 11,791 other acres.

The NPOs 2005 Herd Statistics reported that the Massacre Lakes Herd Area now only encompassed 63,077 public acres and 2,581 other acres. Please explain how the Massacre Lakes Herd Area lost 62,070 acres of the originally designated wild horse and burro territory as identified by BLM records in 1971.

According to the scoping letter sent by the Surprise Field Office, the Massacre Lakes HMA includes 35,846 public acres and 4,044 other acres yet the NPO is reporting 35,872 public acres and only 1,478 other acres. Please explain this discrepancy.

The NPO also lists the Massacre Lakes wild horse AML as a maximum of 20 wild horses while the recent scoping letter states that AML is established at a maximum of 35 wild horses. Please explain this discrepancy.

Based on the NPOs 2007 reported population and reproduction estimates, the Massacre Lakes wild horse population should be approximately 183 wild horses. Yet the scoping letter states the September 2007 helicopter census only identified 110 wild horses within the HMAs including 12 new foals.

What are the reasons BLM believes wild horse populations in the Massacre Lakes HMA is so much lower than the NPO projects and reports?