

**COMMISSION FOR THE PRESERVATION
OF
WILD HORSES**

**MINUTES OF THE COMMISSION MEETING
January 11, 2008**

Commission Members Present:

Commissioner Mike Kirk, DVM, Chairman
Commissioner Christine Brehm
Commissioner Jim Evans
Commissioner Gracian Uhalde
Cathy Barcomb, Administrator

Others Present:

Allen Biaggi, Director, Department of Conservation and Natural Resources
Nhu Nguyen, Deputy Attorney General for the Commission
Dean Bolstad, Chief, National Wild Horse and Burro Program, BLM
Mike Holbert, Deputy Director, Nevada State Office, BLM
Susie Stokke, Nevada Wild Horse and Burro Specialist
Nylene Schoelhorn, Public
Anne Hall, Public
Sheila Schwadel, Public
Bobbi Royle, Wild Horse Spirit
Mandy McNitt, Wild Horse Spirit
S. Summers, Public
Dave Pulliam, Nevada Department of Wildlife
Craig Downer, Public

Noon: Commissioners Kirk, Brehm, Evans, and Uhalde were present constituting a quorum of the Wild Horse Commission. Allen Biaggi, Director of the Department of Conservation and Natural Resources, Administrator Cathy Barcomb, and Nhu Nguyen, Deputy Attorney General for the Commission were also present.

1) Roll Call and Introductions:

After an introduction of the Commissioners and audience members, Chairman Kirk called for a motion to accept the agenda.

2)* Approval of the Agenda:

Commissioner Uhalde motioned to accept the agenda for the January 11, 2008, Commission meeting as presented, seconded by Commissioner Brehm, unanimously accepted.

3)* Discussion and Possible Action: Approval of the Minutes of the Commission Meeting, October 10, 2007

Commissioner Brehm noted that under item #3 there was an error, noting livestock and that there are no livestock on the Nellis Wild Horse Range. Commissioner Evans motioned to accept the Minutes of the October 10, 2007, Commission meeting with the correction, seconded by Commissioner Uhalde, unanimously approved.

4)* Discussion and Possible Action: Report to the Commission and Discussion and Possible Action of Litigation Options Regarding BLM's Management of Wild Horses in Nevada, Allen Biaggi, Director, Department of Conservation and Natural Resources

Allen Biaggi, Director, recapped the request from the previous meeting that he and Administrator Barcomb work with the Attorney Generals Office to investigate the feasibility of initiating a lawsuit against the BLM regarding the wild horse program in Nevada. He noted that they had investigated the background on the financial proportions between states and the Wyoming legal action against the BLM for wild horse management issues. He informed the Commission that it appeared that the agreement between the State of Wyoming and the BLM appeared to have provided additional funding for wild horse management in that State. Mr. Biaggi added that he had determined that litigation is a viable option with a strong likelihood of success; however, there are some things the Commission should consider prior to moving forward. He noted that litigation could potentially impact funds allocated to other states for their programs through a redirection in funding, which a reduction in funding could negatively impact other states.....that it could potentially impact relations with the BLM locally and in Washington, and that the Commissioners needed to consider the legal and program resources such an action would impact. That the Commission, with limited funding would have to bear the cost of such litigation and the workload on the Administrator would increase. He reminded the Commissioners that the Heil funds are slowly being exhausted and such expenditure would exhaust the funds much quicker. Mr. Biaggi finished with stating, "while litigation is a viable

option with reasonable expectation of success, there is also collateral damage to consider.” He urged the Commissioners to weigh the benefits estimated and decide what is the best option to preserve viable herds in Nevada.

Commissioner Uhalde asked what the downside could be? He asked the Commissioners to look at the last 30 years of the horse program in Nevada, he added that all he or anybody wants in for Nevada to receive its fair share of the funding, appropriate for the populations of horses in Nevada to do the job necessary to protect the horses and the land. He added that it is scary that the budget keeps shrinking and the horse program is not adequately funded. He stated he was very concerned.

Commissioner Evans stated the Wild Horse and Burro Act of 1971 impacts more than just the horses; it dealt with protecting the environment and many other environmental issues. He noted the failure of the agencies (BLM & Forest Service) to manage the program is impacting many other environmental and animal issues.

Commissioner Brehm stated she would like to see problems dealt with before they happen, not just reacting to emergencies.....she would like to see any litigation reflecting all management, not just removals.

Commissioner Evans stated that he felt the BLM just doesn't have enough funds to properly manage the program. He noted that they have had the program for over 35 years and still don't have the Appropriate Management Level (AML) achieved in Nevada. Commissioner Evans stated that he “wants BLM to be properly funded to protect and manage and control – the only way is to have a court to oversee and guarantee the job is done, to carry out the obligations designated under the Act.”

Commissioner Uhalde stated he “wants a fully funded program, not an unfunded mandate.”

Commissioner Evans suggested they table this item and go to item #5 to allow BLM the time to update the Commission on programs and be able to ask questions prior to making a decision.

Chairman Kirk stated he would like to deal with this now and make a decision.

Commissioner Evans motioned for “our Director (Biaggi) and whoever else and other agencies move forward to discuss litigation. To pursue a State coalition including the Department of Agriculture, etc, every Department to move forward together as a united front.

Commissioner seconded the motion.

Director Biaggi reported that he thought the Department of Wildlife might be interested but that he had appeared in front of the Agriculture Commission as informational only and had not received a warm reception. He offered that he certainly could pursue this further if the Commission would like.

Commissioner restated the motion: “We request the Director to consult with other agencies in the State of Nevada Government to determine whether or not there is interest in joining with the Commission to seek adequate funding in order to insure that the BLM in Nevada has the resources to carry out their mandated program.”

Seconded by Commissioner Uhalde.

Commissioner Kirk asked for public comment prior to the Commission taking a vote on the motion.

Nylene Shoelhorn stated that she felt “we don’t need to get money to manage the program, we need to stop killing the mountain lions and other predators, we are destroying the last of it. Leave the horses alone.”

No other public comment, Chairman Kirk called for a vote, unanimously approved.

5)* Discussion and Possible Action: An update on gathers and issues in the wild horse program, to include but not limited to water and management on the Nellis Wild Horse Range, Antelope/Antelope Valley HMA gather, and BLM’s budget: BLM

Susie Stokke, Nevada State Lead wild horse specialist, explained the 2008 fiscal budget for BLM. She explained that previously there had been a 41 million dollar budget and that Congress had authorized a \$36.2 million dollar budget, however they will also receive \$2.1 million in fire rehabilitation money for the habitats, \$1.8 million reimbursement from the Forest Service for gathers and placement of excess horses, and a \$1 million dollar carry over from 2007, which will put them back at last years budget amount. Ms. Stokke stated that this would facilitate the scheduled removal of 6,000 horses bureau wide, that Nevada will be able to gather all the horses they were hoping to remove this next year, which is 2,749 horses. She stated the funds would also help with monitoring in 50 HMA’s. She added the adoption goal for Nevada was 250 horses and to do compliance checks on 150-160 horses adopted.

Ms. Stokke informed the Commission that they had completed emergency gathers in New Pass, Ravenswood, the Augusta’s, and just finishing up Antelope/Antelope Valley HMA’s with 845 captured. They had planned on 964 to remove, however when they flew they found the remaining horses all scattered and would take many weeks of extra work and funds to capture the remaining numbers. She stated the BLM felt the remaining horses would be safe through the winter months into spring. She stated they were shut down on that gather but would continue to monitor and include the remaining horses in a gather proposed for Antelope HMA in 2011, that they were at the high end of the AML right now.

Ms. Stokke stated the South Shoshone fire removal was happening now and then moving to Roberts Mountain and Whistler HMA’s. She finished with saying they were concerned with the Little Owyhee HMA for this summer and would continue to monitor the HMA for water availability.

Commissioner Uhalde asked if there was a total of \$41 million, how much of that is allocated to Nevada?

Ms. Stokke stated that Nevada is anticipated to get \$6.3 million and that they had asked for an additional \$1 million to complete additional census work and had received \$400,000 for additional work. She noted that there was changes Nevada was making in policy to better manage the program:

- 1) a census policy, requiring that a census be taken within 12-18 months after a gather to determine and verify remaining numbers;
- 2) encouraging post gather census work because movement can occur; and
- 3) to go to the field more often, officials from the State Office will be going to the field on a much more regular basis to oversee the program, and also training to insure consistency between Districts.

Mike Holbert, Deputy State Director, BLM, stated that Washington BLM does understand the issues, that the heads in Washington and others do recognize the importance and ramifications, and they are working diligently to work within the funding allocated and do the best they can.

Ms. Stokke offered to supply a copy of the budget justifications and allocations to the Commission.

Commissioner Evans asked how much is allocated for census? Ms. Stokke replied \$250,000.

Commissioner Evans asked what happened, what went wrong in the Jackson's? Ms. Stokke replied that "they didn't fly". That the District didn't do post gather flights and field census work to know how many horses were there. She added that this is why they have come up with the new policy direction that mandates post gather census flights.

At this point Cathy Barcomb, Administrator of the Commission, showed photos from a trip she had taken with BLM personnel, including Susie Stokke, of northern Nevada. She explained they had traveled approximately 1,500 miles in 5 days and had gone through many of the northern HMA's, with focus on the ones scheduled for emergency gathers. She explained that BLM State and Washington Office personnel were touring the areas to insure that they had been placed in proper priority for the upcoming gathers and to insure no horses were in danger of death. Ms. Barcomb explained how dry the habitat showed, the continued drought conditions, and how devastating the immensity of habitat the fires had destroyed. All of these factors affecting the horses. With input from BLM, both she and BLM personnel explained and showed the photos documenting the need for the emergency gathers.

Mike Holbert, BLM, expressed that he wanted the Commission to understand their budget.....that \$6.3 million was estimated to be sent to Nevada, however, the budget is preliminary and until the dollars actually get here, it could be adjusted up or down, that \$6.3 million is "proposed", not guaranteed.

Commissioner Uhalde asked, "who in Washington do we talk to about this?"

Mr. Holbert answered, to talk to Don Glen and then Bud Cribley.

Susie Stokke then reported on the Nellis Range water developments scheduled by BLM.....they had gone to Cedar Well to do work but the ground was frozen, will work there when possible, that they need additional tanks, etc. at Cactus but that it is \$25,000 to install just one, that they have no funding and are looking for partners and that they anticipate doing Silver Bow in February 2008.

Ms. Stokke added that she is very worried about 2008 and that the continued drought could cause a dangerous situation for the horses. The gather for December 2007 had been postponed and the horses would be gathered in December 2008. She noted that they would be watching very carefully to insure the horses don't get in trouble. She added that the military has always been very helpful in hauling water when necessary. She finished by telling the Commission that it would take approximately a quarter million dollars to fix the Nellis water problems. She stated that currently the Appropriate Management Level (AML) on Nellis is 300-500 and current estimated census numbers are 1,350 in December 2007.

Ms. Stokke reported that they were still looking for testing opportunities to determine the cause of the deaths of 71 horses on Nellis in the summer of 2007. She explained that they know it was a high concentration of nitrates but DRI, the Air Force, and BLM were all working together to try to determine the source of the nitrates. She stated an additional problem was when the rains came that it filled the area back in with water so ground testing in the hole was compromised and that now its frozen. She added that the military had not used that particular de-icing agent since the late 80's as was being alleged in the media. Also, that there was no record of any "dumping" of these agents in the pone and that they are still trying to determine where the compound nitrates have originated from. She stated she would keep us up on any information they received.

Ms. Stokke reported on the Jackson animals as the Commission had asked for a report of horses vs cows and wanting to verify numbers, not rely on the media. Ms. Stokke reported that there were 2,604 AUM's of horse use authorized but there were 5,592 of active horse use. She added that there were 3,244 of authorized AUM's for livestock, and only ¼ that number was authorized.

Chairman Kirk noted that the water developments are needed now, not years from now, if BLM is to insure the horse's safety through the summer months. He expressed his frustration that this has gone on for so many years and no improvements to the conditions on Nellis. Commissioner Brehm noted that the forage is good on Nellis, but agreed water is at a critical stage and something must be done. She also added her frustration with the length of time these severe water source conditions have been present with no measurable improvements, and each year putting the horses lives in jeopardy.

Dean Bolstad, Chief of the National Wild Horse Program wanted to clarify the BLM budget. He reported that to understand the BLM budget and actual dollars to Nevada, you must understand

that millions of dollars are allocated to the Eastern States offices for the adoption and holding of Nevada horses, that not many horses are adopted within the State of Nevada and must be shipped all over the nation to satellite adoptions. He explained that those monies are reflected in the Eastern States offices budgets but are actually spent on Nevada horses. In addition he reminded the Commission of all the Nevada horses that reside in the sanctuaries, both in long and short term holding facilities.....that those horses won't show up on the Nevada budget but will show up under other National programs or Eastern States budgets. He expressed that much more of the budget is allocated to Nevada horses but not just under the Nevada State budget as was reported earlier. He also noted that Senator Reid keeps a watchful eye on the Nevada wild horse budget and is continually being updated with information.

Commissioner Uhalde stated that they understood, however, they want to insure that the actual State of Nevada gets the funds necessary to manage and monitor the land and protect the horses. That we just want Nevada to have the funds necessary to do their job.

Mr. Bolstad reported that in total, ½ of the BLM budget goes for Nevada horses. He added that he has 20+ years experience in range and that the number of horses very far exceeds the capacity to support them. He added that there were 47,000 horses in the 10 western states in 2000. He reported in more recent years from 2000 to now it has gone to 30,000, then to 28,500 estimated nationwide. For Nevada he reported 25,000 horses in the year 2000, and an estimated AML of 13,500 for Nevada now. Mr. Bolstad reported that “our mission is to do what is right for the land.”

6)* Discussion and Possible Action re: Fertility Control Programs in Nevada, past implementation on herds and the need for reports showing the results of the Fertility Control Program

Mr. Bolstad presented an excellent report updating the Commission on the history, goals, existing PZP and how used, limitations, and the status of research and results. (See attached).

7)* Discussion and Possible Action re: BLM's proposal to geld mustangs in Herd Management Areas to remain in the wild, a discussion on recommendations to BLM and the National Wild Horse and Burro Advisory Board on Public Lands, to include but not limited to, policy and procedures.

Cathy Barcomb, Administrator, reported that she had put this item on the agenda for discussion by the Commission as the option of gelding had most recently been included for the Nellis gather plan for December 2007. She reported that both she and Commissioner Brehm had discussed this when the gather plan came out and had concerns that BLM had no policy or procedures developed for gelding stallions and that this had never been presented to the public for comment. Ms. Barcomb explained that she had no position on whether this should be done or not, nor that the Commission ever discussed this. She added that there was no information presented in the gather plan to even inform the public as to what exactly was being proposed, procedures, criteria, numbers, etc.

Ms. Barcomb explained that she had compiled a list for the Commissioners review of some of her concerns for gelding and wanted to ask if they had anything to add. She informed them that the Commission need not take action on this item at this time, it was more for informational purposes and opening the door for discussion and review of BLM's proposal, however, other than inserting it in a gather plan, there was nothing else out for review and BLM did not have any policy or procedures for doing this action, that no evaluations on BLM's part had been done.

Ms. Barcomb explained that she would be writing a letter to BLM expressing the concerns and also requesting a thorough evaluation be completed prior to any implementation of any gelding or impacts to the horses. That any action as major as this needed thorough forethought and expectations to meet before even suggesting it be implemented.....the feasibility needed to be determined. She stated that she had heard that stallions with deformities would be targeted so as not to pass it on to offspring but by gelding them and not bringing them in...they could live out their lives on the range. Ms. Barcomb added that some of her concern, but no limited to, were:

**WILD HORSES
GELDING OF STALLIONS ON PUBLIC LANDS**

**BLM HAS NO POLICY AND PROCEDURES
BUT HAS PUT GELDING IN THEIR GATHER PLANS AS AN OPTION**

CONCERNS/ISSUES:

Temperature/time of year

Anesthesia yes/no

Who will be performing and how?

Transporting to PVC or other main facility vs field operations

Field operation policy

How long will they be held post surgery

Shots to prevent infection?

Monitoring for Results

PROTOCOL:

Which horses will be targeted

Age

Color

Conformation

Who will be making the decisions and those decisions need to be based on policy

STUDY

Parameters of doing this as an initial study

What are you looking for in the study (bands, aggression, recovery time, etc)

The need to set up criteria to study and look for.

WHERE are you going to do the initial study area(s)? Should be in locations that are easily monitored for results. Good volunteer base. (not Nellis)

Set up dates, times for monitoring and document results, distributing reports and to “who”?

Should be on healthy herds and animals, not failing populations that would skew results.

ANALYSIS

What is the Cost Benefit to doing such an action?

What is the expected Herd/Recruitment/Fertility Control benefit to such an action?

BACK TO COMMISSION MEETING

Commissioner Uhalde asked BLM what they thought the potential obstacles might be?

Dean Bolstad responded that no procedures or protocol had been developed and should be properly assessed prior to any implementation in the field.

Commissioner Uhalde stated he thought that was a good approach.

Mr. Bolstad stated that it would not just be deformities but also adoption demand, if horses could be gelded and live out their lives in the wild, on the range, it would ease the pressure on the sanctuaries and cost to the taxpayer, in addition to letting them stay wild.

Chairman Kirk asked what field procedure were they proposing for Nellis?

Susie Stokke reported that they weren't proposing a field procedure, that they would ship the horses to a facility, quarantine them, do the procedure and in approximately 6 weeks return them to the field.

Dean Bolstad added that BLM wouldn't contemplate even doing this in the field without procedures.

Chairman Kirk asked who would be deciding “which” horse gets cut and which one goes for adoption?

Mr. Bolstad replied that was a good point and that BLM needed to be concerned more with genetics and herd management in making these decisions.

Commissioner Brehm stated that we need to express our concern that this was actually proposed in a document, the Nellis gather plan, as an option but there was no policy in place and that before BLM does this, it must develop procedures.

Susie Stokke added that they were beginning work on a Herd Management Area Plan (HMAP) for the Nellis range and pulling out special options and analyzing them to be implemented in gather plans. Ms. Stokke stated that she would be very interested in running a draft HMAP through the Commission prior to public input to look at specific options and work with BLM on this plan.

The Commissioners all welcomed working with her on a plan. Commissioner Evans stated that he felt gelding would need to be presented as a “study” and evaluated.

Ms. Stokke stated that they anticipated bachelor bands would be created and needed to be monitored for results, that she might have something ready for the next Commission meeting.

Commissioner Brehm added that it was just scary that it was actually inserted in a gather plan, that disease outbreak from exposure at a facility among many other things needs to be evaluated prior to it ever being implemented.

8) Public Comment Period

Mandy McNitt, from Wild Horse Spirit, asked a variety of questions, more so than making any public comment. Both BLM and the Commission tried to facilitate her questions.

She asked how much it cost to haul water.....Commissioner Uhalde replied that it was his ranching experience and cost experience that puts delivery at \$120-140 per hour, plus \$3 per gallon, plus flat tires, broken trucks, etc. In addition, it was his experience that many companies will not send their trucks out on dirt roads.

She asked how much do water tanks cost? Susie Stokke reported that tanks they are purchasing are costing \$50,000 each and approximately \$25,000 each to install 6 on Nellis.

She asked about re-seeding efforts? BLM responded that they spend millions of dollars each year in habitat and fire rehabilitation efforts. But, he added, you need rain to make those seedings grow.

Commissioner Evans reported that there are many coalitions partnering and adding to BLM's efforts and re-seeding plans.

Allen Biaggi, Director, added that the Nevada Division of Forestry maintains a seed-bank and nurseries for re-habilitation efforts statewide.

Ms. McNitt asked about the gelding and genetic testing? Susie Stokke responded that the BLM has already done approximately 50% of the HMA's and found them to be genetically diverse, mixing with others and that every other gather BLM gets results and analyzes them.

Ms. McNitt asked how much horses eat? Chairman Kirk, equine veterinarian responded that horses need approximately 2% of their body weight each day of dry matter.

Ms. McNitt asked how much a cow eats? Chairman Kirk responded, “about the same”. Susie Stokke tried to briefly explain Animal Unit Measure (AUM), which is animal consumption and suggested that she would be happy to meet with Ms. McNitt to fully explain land use management and allocations on a one on one basis. She also added that horses are on the land 12 months of the year and livestock are allocated for specific use periods.

Craig Downer, wildlife ecologist presented the Commission with written testimony, (see below)

STATEMENT OF CRAIG C. DOWNER, WILDLIFE ECOLOGIST, TO THE NEVADA COMMISSION FOR THE PRESERVATION OF WILD HORSES, for its meeting on Noon, November 26th, 2007. Washoe County Commission Chambers, 1001 East 9th Street, Reno, NV

Dear Sir/Mame:

I appreciate this opportunity to communicate my views on what is being planned for Nevada’s wild horses and wish you well in the fulfillment of the Leo Heil legacy for the preservation of wild horses in the wild in the state of Nevada”.

I. Concerning Agenda Item Number 4, I suspect that the Nevada Wildlife Commission may be urging the state of Nevada to sue the BLM in order to maintain so-called Appropriate Management Levels (AML’s) of wild horses and burros. If this is the case, I urge that this recommendation NOT be adopted! The AML’s that have been set are in almost all cases much too low to assure the long-term or even the short-term viability of the wild equid herds in question and represent a violation of the true intent of the Wild Free Roaming Horse and Burro Act, P.L. 92-195. It is also common knowledge that the Nevada Wildlife Commission, along with the Nevada Department of Wildlife, has always been opposed to the rights of the wild horses and burros to remain on the public lands and has repeatedly sought to overturn the Act in spite of the fact that the horse species is a returned native in North America and that the burro also has its not-far-removed evolutionary roots in this continent. The return of the horse and also of the burro to their natural way of life in the home of their ancestors is a clear positive in Nevada and the West, restoring the equid element in the native mammalian fauna and enhancing the native ecosystem. Few lineages are as rooted in North America as horses and their kin.

One very important role that the wild horses and burros offer today concerns their ability to consume dry flammable vegetation and, thus, to prevent many of the catastrophic fires that are occurring in present times due to mounting Global Warming. With their post-gastric digestive systems and their wide-ranging, semi-nomadic life styles, these herbivores are perfectly suited to become America’s very best fire preventers, and are much better at this than ruminant grazers and browsers such as cattle, sheep and deer, whose digestive systems and metabolisms are overtaxed by coarse, dry vegetation. Significantly, by cropping this coarse, dry vegetation, the wild equids symbiotically benefit the various ruminant grazers, as has been proven by studies of the ecological relationships of grazing communities in Africa and in North America. Wild equids provide a great variety of important and intertwined ecological services. These include: (1) accomplishing the successful seed dispersal of many native plants, (2) helping to build the absorptive humus content of soils through their feces, which in turn aids in fire prevention by

allowing soils to retain more moisture. The latter lowers the incidence of major fires, provoked by lightning, humans, etc., many of which are dampened out by moist soils. Humus build up through horse feces also promotes nutrient recycling among plants and animals, thus enhancing the ecosystem. (3) Horses and burros also aid other species by their physical actions. For example, their breaking of ice during winter freezes allows other species to access forage and water. These would otherwise perish. Similarly their opening up of trails in heavy snow or through heavy brush allows other animals to move about in their habitat in search of food, water, mineral salts, shelter, warmer areas, etc. The wallowing habit of wild equids creates natural ponds whose impacted surfaces are catchments for and retain scarce precipitation and, as a consequence, provide a longer lasting source of water for a wide diversity of both animals and also moisture-loving plants, thus helping to create riparian habitat for a great variety of plants and animals. Wild equids can also locate water seeps through their keen sense of smell and enlarge these through pawing during critically dry periods of the year. This then allows many other species to access water that would otherwise go without a drink.

I could go on listing many more examples of the symbiotic benefits of wild equids. Unfortunately, so many of these positive ecological contributions by wild equids are ignored by local, state, and federal officials due to their negative agenda toward wild horses and burros, an agenda that is being carried out today throughout the West in the form of wild horse and burro elimination or near elimination from their legal herd areas established by the 1971 Act. Isn't it high time we learn not to repeat the tragic mistakes we made in centuries past?!

II. Concerning Agenda Item Number 5: water management on the national Nellis or Nevada Wild Horse Range (NWHR, our nation's first wild horse sanctuary established in 1962), here there has been a clear manipulation of range boundaries and access to public water sources in the original refuge that have been designed to squeeze out the wild horses and burros from the vast majority of their original 1.3 million acres of legal herd area. In spite of the letter and intent of the law, NWHR's population of wild burros has already been eliminated and the population of wild horses has been drastically reduced from one numbering in the several thousands to 2,000 then to 1,000, the approximate current population. As of 2004, an AML of 300-500 wild horses has been unfairly adopted, of which 75 may be castrated stallions. And it is now the intent to gather to the lower figure in December. The mares of the remaining herd would be semi-sterilized under a questionable experimental program using PZP. By cleverly denying wild horses access to only about a dozen of the over 101 natural water sources in NWHR, the BLM has abandoned its legal duty to defend the rights of the wild horses and joined forces with their worse enemies! Of the few water sources that remain accessible to the wild horses, plans are now afoot to further restrict these by erecting horse-proof fences that other forms of wildlife can readily pass through. This is discrimination and a mockery of wild horse protective laws at their worse! All the while the BLM is promoting bighorn and other big game animals in the NWHR as a cave in to the persistent and well-funded demands of the Nevada Department of Wildlife, Bighorns Unlimited and other hunter organizations.

For the above and numerous other reasons, I strongly urge the Nevada Commission for the Preservation of Wild Horses to fulfill its legal duty under the Leo Heil legacy by vigorously opposing these ill-intentioned designs against the wild horses of the national Nevada Wild Horse Refuge! This used to be called “the world’s greatest wild horse sanctuary”, but its wild horse population today of ca. 1,000 is only about one tenth of what it used to be when I toured it years ago. This population should not be further reduced according to an inadequate AML that would leave only one wild horse per 3,250 acres of the original legal refuge. For Nevada’s Wild Horse Commission to fail to protest what has and continues to happen to NWHR’s wild horses in the wild would constitute an entire abrogation of the Leo Heil Will to promote “the preservation of the wild horses in the state of Nevada”. Please provide me with more information and opportunity for review on all policy recommendations for actions affecting the wild horses of the state of Nevada made by the Nevada Commission for the Preservation of Wild Horses concerning NWHR and any other areas in the state where the wild horses still manage to survive.

III. Concerning Agenda Items (6) possible fertility control of mares and (7) possible gelding of mustang stallions, I again admonish the Commission not to be manipulated by the wild horses’s chief enemies. By administering either or both of the above measures on the small remaining wild horse population, the BLM will be further crippling the natural vitality and survival ability of this still cherished, though greatly diminished, herd. Observational studies have proven that both invasive techniques cause acute stress and widespread and long-lasting social disruption to the wild horses. This is not what these naturally free-living horses, a National Heritage Species, need in their already very challenging desert habitat, here further impacted by military flights, bombings, toxic discharges, and unknown tests. (1) To take away the stallion’s natural drive by castration and (2) to cause the mares to repeatedly recycle into estrous through the inoculation of PZP, thus overly challenging the dominant stallions who guard their mares – could prove to be the straws that broke the camel’s back in the case of these valiant wild horses. This would, indeed, be a case of “managing for extinction” (See: Animal Welfare Institute. 2007. Managing for Extinction: Shortcomings of the Bureau of Land Management’s National Wild Horse and Burro Program. Washington, D.C.).

The wild horses of the NWHR contain significant Spanish Mustang inheritance, as has been proven by genetic and morphological evaluations. The Spanish Mustang is itself an endangered lineage and is highly regarded for its hardiness and its stamina. Though only a small remnant of NWHR’s wild horses are now left, their future survival at long term viable levels that should be in the thousands and in the wild is very important! Unappreciative and downright hostile plans to further diminish or even to eliminate this very valuable herd must be vigorously opposed! And it is the wild horse commissions’s duty to so oppose such negative and basically dishonest and deceitful plans! In wildness is the true preservation of each race and of each species on Earth, not behind a fence or in some corral, for in wildness the true vigor of each kind is preserved/restored, for there it comes to a reciprocally balanced relationship with all other kinds, a dynamic equilibrium that can last throughout the ages. And there is no more important place in which to

preserve the true character and spirit of magnificent horse kind on planet Earth than the vast and enchanting Nevada Wild Horse Sanctuary of central and southern Nevada!

Respectfully submitted,

Craig C. Downer, Wildlife Ecologist
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ccdowner@yahoo.com
P.S. RSVP

Cathy Barcomb, Administrator, reported that she was working with the Mustang Heritage Foundation and doing research to get Velma Johnston “Wild Horse Annie”, inducted into the Cowgirl Hall of Fame in Ft. Worth, Texas. She added that there have been discussions of doing books similar to the old Hardy Boys and Nancy Drew books but relating to Annie and wild horses. That this induction, the books, and educational packets put together for public schools is anticipated to raise awareness of the wild horse program and enhance the adoption program. The thought is though more public awareness that more Nevada wild horses will be adopted. The Commissioners all expressed their support.

9)* Set Next Meeting Date

After discussion and wanting to keep all areas of the State informed and making the Commission available to all Nevadans, the Commission decided to try to meet in Battle Mountain on April 11, 2008.

10)* Adjournment

Commissioner Evans motioned to adjourn the meeting, seconded by Commissioner Uhalde, unanimously approved. Meeting adjourned.