

Nevada Commission for the
Preservation of Wild Horses
Cathy Barcomb-Administrator
885 Eastlake Blvd.
Carson City, NV 89704

April 9, 2008

RE: Commission Meeting – Public Input

Dear Ms. Barcomb:

I am writing to provide information and input for the Commission's upcoming meeting and items listed for discussion and/or action on their agenda.

The first item of concern, as you and the Commission are already aware of, is the issue of the BLM working towards a management option for population control of castrating stallions and returning them to the range after removals.

Reviewing National Wild Horse and Burro Advisory meeting minutes, the original proposal by the Board requested BLM review areas that already captured long-term holding area geldings could be returned to and managed as a portion of the existing population. After significant delay, BLM responded by citing that this was not a feasible option with no further explanation offered as to how they had come to this conclusion.

However, BLM immediately volunteered the castration of stallions during removal operations as a feasible option instead. Since then, the focus switched to this newest approach and BLM has been researching returning geldings to the range for the last few years and are apparently poised to begin initiating sterilizing wild horses in future management proposals. This is evidenced by offering gelded stallions as a management Alternative in at least two separate gather proposals in the last year; the Spring Mountain Complex and the Nevada Wild Horse Range (aka Nellis).

BLM has also already drafted a paper titled, Options for Managing a Non-Breeding Component within Self-Sustaining Herds, that outlines eight Complexes and seven individual HMAs targeted for managing 25% of the population as geldings with totals ranging as high as 1,673 geldings.

The HMAs being considered include; CA-Twin Peaks, NV-Antelope, Antelope Valley, Spruce-Pequot, Goshute, Blue Mountains, Kamma Mountains, Lava Beds, Seven Troughs, Nightengale Mountains, Shawave Mountains, Buffalo Hills, Granite Range, Fox-Lake Range, Black Rock East, Black Rock West, Calico Mountains, Warm Springs Canyon, Buck and Bald, Maverick-Medicine, Callaghan, Clan Alpine, Diamond, Diamond Hills North, Diamond Hills South, Fish Creek, Seven Mile, Little Fish Lake, Little Owyhee, Snowstorm Mountains, Monte Cristo, Sand Springs East, Sand Springs West, Nevada Wild Horse Range, New-Pass Ravenswood, Owyhee, Little Humboldt, Rock Creek, North Stillwater, Pilot Mountain, Stone Cabin, Saulsbury, Hot Creek, and three USFS WHT territories, UT- Sulphur, WY-Adobe Town, Salt Wells Creek, Divided Basin, and White Mountain.

I have attached the full document for the Commissions review of BLMs plans, estimates and proposals that are being considered in their draft research.

Additionally, I have reviewed the Commissions letter recently sent to the National Wild Horse & Burro Advisory Board addressed to BLM State Director Ron Wenker, concerning the issue of returning sterilized wild horses to the range

I was pleased to see that the Commission recognized the seriousness and irreparable impacts this kind of permanent management tool may hold for future wild horse sustainability. Your own research, which revealed little information is available on the subject, as well as the call for extensive evaluations before this should even be considered, was commendable.

The Commissions efforts to insure that the National Wild Horse Burro Advisory Board was made aware of the Nevada Department of Agriculture's current involvement in the Virginia Range wild horses being released with a portion of geldings, was a viable solution for study and acquiring data before any further actions are taken that may cause irreparable harm to America's wild horses.

Because the Commission has recognized the need for acquiring further data to determine potential impacts, I would like to strongly urge the Commission to adamantly support their own recommendation to study and gather data from this current experiment and to support BLMs partnering with NDA to gather long-term statistics before any further movement is made in this direction.

Since a gelding herd has already been implemented, it is not necessary for BLM to geld additional herds, as most of BLMs management tools have become established through data acquired through one study (such as the Population Modeling programs that were based on the research conducted in the Garfield Flat HMA)

Also, due to the recognition that data is extremely limited with severe potential impacts, I would also hope that the Commission will take a strong stand on a no-gelding management

policy for the Nevada Wild Horse Range. The historical lack of access to the range by BLM and the general public alike makes this an extremely odd and difficult place to “study” the issue – returning geldings to a place that is often fraught with rescheduling due to military exercises and activities seems antithetical to the intent of learning more about this newest tool in BLMs arsenal of strategies in wild horse management.

As for the Nevada Wild Horse Range itself, serious issues regarding on the range management have been developing within the HMA. Though BLM expanded the HMA status in 2004 to include the entire historical Herd Area of approximately 1.3 million acres, they have changed key boundaries, removed historical access with the intent of no longer allowing a permanent herd in the historical use area of Kawich Valley, have allowed water systems to fall into disrepair for years, have failed to apply for water rights on 3-4 wells that were suppose to supplement removals of historical water sources and USFWS, in partnership with the military, has proposed fencing all water sources on the Nevada Test and Training Range with NO access provided or mitigation measures planned to assist wild horse herds on the range.

While I am aware that the Commission has evolved into focusing more on wild horse removals as their choice for supporting healthy herds in balance with other uses, the original intent of the Heil Trust Fund was to support wild horses and secure functioning habitat to preserve them in their wild state.

In this particular instance, the Nellis wild horses are facing crisis, such as occurred this past summer during the July emergency removals, that are not due solely to “overpopulation” per se, (the newly established AMLs are a separate issue altogether) but due in part by BLMs failure to adequately secure and maintain the necessary habitat requirements for healthy herds.

I would hope that the Commission will again align itself with the original intent of Mr. Heil and the reason the trust fund was established – to secure and safeguarding proper habitat first for wild preservation before focusing on removals that may not be fully justified.

The current concerns of costs associated with the Wild Horse and Burro Program in general, the overabundance of wild horses in long and short term holding, the adoption demand failing to meet the accelerated removals, which have resulted in over 70,000 wild horses and burros being taken in the last six years, and the continued risk of wild horses being sold for “Unconditional Sale” and Instant Titling, are all issues that can be successfully addressed by first focusing on proper maintenance and management on the range.

The Nevada Wild Horse Range needs the Commissions support for securing proper habitat to allow self-sustaining herds before they switch focus to finding good homes for those removed,

merely due to the failure by BLM to implement previous management plans and/or securing critical resources necessary for their health and survival.

On a final note, I am pleased to see the recent updates on the Commissions website and truly hope the Commission fully recognizes and utilizes this powerful tool to help preserve and protect Nevada's wild horses and burros through the education and involvement of Nevada residents.

If there is any information not already addressed that the Commission has regarding any of the items listed on their agenda, please be aware that I would be very interested in reviewing pertinent documents and information for review that may provide assistance in helping to properly manage, maintain and support viable herds in Nevada.

Thank you for your consideration.

Sincerely,

REMOVED