

Bureau of Land Management
Battle Mountain Field Office
50 Bastian Road
Battle Mountain, Nevada 89828

August 29, 2007

RE: Austin Complex Environmental Assessment
EA# NV062-EA07-083

Dear Mr. Furtado:

I am responding to the opportunity to provide public comments and input regarding the Austin Complex and will say, I regret not being able to respond to the preliminary inquiries about the proposal so that adequate consideration could be given to my input in a timely manner before issuing this final proposal.

I would like to express my deep appreciation for the opportunity to participate in the management of our Nation's resources.

If you have any questions, please feel free to contact me.

Sincerely,

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Based on my review of this proposal, two issues were identified that I would like addressed.

The first is that no forage allocations for population objectives of big game species have been included in this management plan, expected to be active for several years within the planning area.

Why this is of significant concern to me is first, Nevada Department of Wildlife is very active in wild horse management within our State and often demands limits on wild horse and burro populations to increase wildlife populations – this is to be expected as this is their passion and purpose.

In past management, their aggressive actions have often been necessary to recover many species that have had severe impacts done to populations through human activities. However, times have changed and wildlife populations within the State of Nevada are now at all time highs (with the exception of mule deer, though they are still 4 to 10 times higher than what is estimated as naturally and historically occurring within Nevada).

The statewide pronghorn antelope population was estimated for 2007 at 23,500, almost as much as the entire remaining wild horse population in America. Since beginning pronghorn management throughout the state, it is my understanding that statewide population objectives have continued to change and climb.

The first goal was established in 1980 at 20,000. This changed to 25,000 and a recent chart indicated that 28,000 could be achieved within Nevada. Additionally, the nationwide estimate for pronghorn antelope in 2002 was over 600,000.

My concern is, without limits on forage, population objectives and clearly established forage allocations within the planning area, the open-ended opportunity to have unlimited growth of big game species at the expense of other rangeland users is a serious probability, especially during the course of the 10-year permit.

From my limited experience, it would also appear that NDOW targets wild horse and burro forage for wildlife use before they approach grazing allocations for livestock, as wild horses and burros are the easiest target for reductions and eliminations.

Just because big game species are termed "wildlife" does not mean that they too cannot cause serious rangeland and riparian damage if their numbers get excessive. I have already seen two instances that reported damage caused solely from "wildlife". One cited that big horn sheep were the casual factor in riparian degradation as they had exclusive access to the spring in question and the other stated elk were causing riparian damage and prevention of recovery in a wildfire rehabilitation area. The elk damage was noted as occurring for over 5 years with nothing done about it.

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Perhaps because NDOW has worked so hard to bring species in and loves to watch them thrive, they have a hard time reducing numbers if necessary, hoping to preserve them by perhaps transferring or introducing them to other areas to continue population expansions.

However, regardless of the reasons, BLM has little legal recourse to big game population expansions and over-utilization to resources if they have failed to establish proper rangeland guidelines and resource allocations during their management plans such as this one.

BLM also states that the pronghorn population within the proposed planning area has been steadily growing. At what point will BLM state, "That is enough?" as they do with livestock, wild horses and burros?

Are there any plans to introduce other big game species within the planning area such as elk? There is a reasonable amount of competition between elk, cattle and wild horses for similar forage according to NDOW specialists. Big horn sheep? If so, now is a very good time to plan for forage allocations and population objectives to accommodate a truly thriving ecological balance for all species.

The specific request is, include population objectives and forage allocations for all big game species in the Austin Complex.

The second issue I would like considered is the 14,400 acres of the South Shoshone HMA that exists within the Austin Allotment and Cedar Pasture. This assessment states that, despite the area being located in an HMA, no wild horses are allowed to live within their own federally designated habitat due to BLM not issuing them any forage. Even though resources are available, they have been given to exclusive livestock use within the South Shoshone HMA.

Additionally, all the HMAs within the proposal area have been issued AMLs that provide self-sustaining viable populations of over 150 wild horses, except the South Shoshone HMA, currently with a maximum AML of 100.

It was unclear to what extent the AUMs available are within the 14,400 acres but the Cedar Pasture would indicate that forage, though available year-round, is rather limited as only 81 cattle are permitted (906 AUMs). It is also unclear how many sheep and AUMs are being approved of in this section. I would like to request the specific AUMs available within the 14,400 acres in the South Shoshone HMA.

My concern is based on the following information that I have compiled over the course of the last year while researching the remaining wild horse and burro herds of America.

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At the inception of the WH&B Program, 318 Herd Areas were identified for preservation and protection. Since then, 199 remain, a loss of 119 protected habitats. Of the 53,444,499 million acres described as Herd Area acres, the BLM has only designated 34,441,150 acres as suitable for long-term management and due to many herds recently being zeroed out, it is probably much less than that, indicating a minimum loss of 19 million acres that had been reserved for their preservation and protection.

Wild horse populations were estimated at the turn of the century to number 2-3 million strong. BLMs first reported census of wild horse and burro populations in 1974 estimated 60,000 were on the range, 14,000 of these were estimated to be burros leaving an estimated 46,000 wild horses. Today, the BLM manages for a National wild horse AML of 24,556 and a national wild burro AML of 2,965 (though researching the *true* numbers shows it is only 2,695).

BLM management has caused the permanent loss to the American people of approximately 21,500 wild horses and 11,000 wild burros, often thought of as National treasures and our heritage species.

At the beginning of the “5 Year Management Plan”, when nationwide wild horse and burro populations were estimated at a little over 53,000 before the removals began, as of October 1, 2001 through March 1, 2007, over 70,000 wild horse and burros have been removed from public lands.

In 2006, the BLM removed wild horses and burros from at least 12 HMAs or WHTs due to the fact that they had been completely zeroed out for wild horse or burro use.

It is estimated that BLM has issued AMLs for over 70% of the herds that are not self-sustaining or genetically viable and the Battle Mountain Field Office zeroed out the Silver Peak HMA in 2006, citing one of the reasons this was necessary is signs of inbreeding were beginning to show; the population in question? 79 wild horses.

With the South Shoshone HMA having a maximum AML of 100, this means that it will often hover around the 79 population number or less, assuming BLM sticks to its strategic plans of gather cycles every 3-5 years.

Based on all of the information above, it has become imperative that the remaining wild horse and burro populations and their habitat be closely safeguarded, and this includes genetically viable and self-sustaining numbers.

The wild horses of South Shoshone have found suitable habitat within their HMA, based on the information provided in this proposal, which has identified 23 wild horses within the HMA boundaries in 14,400 acres in the Austin Allotment. The current AML has been established at 0 within this area.

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Since it is unclear as to the exact amount of forage and AUMs available within the 14,400 acres, a concise proposal cannot be made. However, I would like to recommend that the AUMs for that area be split between livestock and wild horses with a AML cap of 50 to move the South Shoshone herd closer to a viable number and still allow livestock grazing within the area.

For example, based on the Cedar Pasture available AUMs of 906, split the AUMs between livestock and wild horses so that each would support 453 AUMs. This would cause an increase in appropriate management levels for wild horse population by a maximum of 37 wild horses but still allows 37 head of cattle to continue to graze the area year long or if sheep would increase the economic productivity, then 90 sheep.

If splitting available forage exceeds 50 wild horses, then “cap” the AML at this number and continue to issue the rest of the forage allocations for livestock operations.

I know there are many good ranchers who really care about the land, the resources and work very hard with BLM to improve and protect our resources. There are also those who don't, that believe public land is their land and don't appreciate the fact that they have been granted special privileges with America's resources.

In addition to being able to feed a cow for a little over \$1.00 per month (can anyone else do this?), they often get federal subsidies and help through government programs. It seems to me that their “sacrifice” for these privileges should be to recognize how many citizens love wild horses and burros and just like other wildlife, want to be able to see them and know they are thriving in America too.

The USDA reported that as of January 2007, an estimated 97.1 million cattle are within the United States and one figure I saw stated that over 9 million cattle graze public lands in the West. Surely there is a little room for self-sustaining, viable populations of free-roaming wild horses and burro as well.

As previously stated, I apologize for not providing this input and suggestions in the preliminary EA but truly hope you will consider them for proper rangeland management for all multiple uses objectives that the BLM has been charged with providing stewardship for.