Department of the Interior
Bureau of Land Management
Patrick Putnam-Assistant Field Manager
4701 No. Torrey Pines Drive
Las Vegas, NV 89130-2301

October 17, 2007

RE: Nevada Wild Horse Range-Wild Horse Management
Preliminary Environmental Assessment #NV-052-2007-362

Dear Mr. Putnam:

I am writing to submit the following comments, input, concerns, questions and suggestions for your consideration regarding the proposed management actions for the historical wild horses placed in BLMs care located in the Nevada Wild Horse Range in Southern Nevada.

I would like to express my deep appreciation for the opportunity to participate in the proper management, safeguarding and stewardship of our Nation's irreplaceable resources.

Thank you for your consideration.

Sincerely,

Cindy MacDonald

The Historical Wild Horses Of The Nevada Wild Horse Range

Nevada Wild Horse Range Wild Horse
Captured December 2003

Public Comments & Input
October 2007

FERTLITY CONTROL

The proposed actions regarding wild horse management in the Nevada Wild Horse Range deceptively imply that three alternatives are being presented when in fact, only one alternative is; the removal of 800-820 wild horses and all mares subject to fertility control injections again.

While BLM pretends to offer the choice of Alternative 2, which creates the slight variation of implementing fertility injections on mares plus castration of stallions, both Alternative 1 & 2 state that fertility control injections in mares is the only alternative available.

Considering that mares returned to the range after the 2003 removal operations were injected with fertility control treatments and BLM reported a 30% population increase between Fiscal Year 2004 and 2005, then reported in the Preliminary Environmental Assessment that the effectiveness of these injections only impacted reproduction rates by a mere 2%, the use of this treatment, at least as a fertility control measure, appears to be both a waste of funding, effort and time.

Additionally, independent observations of herds treated with PZP have noted a wide variety of disturbing impacts to herd dynamics.

Some of these impacts include younger mares treated with only one injection of PZP not reproducing for several years after the injections, some finally reproduced but long after BLM stated PZPs effects would wear off, and old mares that were no longer reproducing became fertile again and began producing offspring.

Severe impacts to stallions and herd social structures have been noted as well. Natural reproduction cycles follow the path of mares coming into estrus, various mating “dances” ensuing including aggressive behavior exhibited by stallions to secure their breeding privileges and then a return to the business of survival once mares have become impregnated.

When PZP is injected, most mares do not become pregnant after coming into estrus and instead of the annual mating period being of relatively short duration, the return of the mares again and again and again to their estrus cycles has been found to cause stallions to react accordingly.

As a result, stallions are continuously and unnaturally being placed on “high alert” because the mares keep signaling it is time to mate and subjecting them to repeated attempts by stallions to fulfill natures “duty”.

This also has been noted to cause competing stallions to aggressively challenge the dominant band stallion, forcing him to defend his mares and breeding privileges repeatedly and excessively. Stallions become worn out, the constant battles result in a greater proportion of wounds in both frequency and severity, the wounds do not have the proper time to heal before battles begin again and even fatality was noted from this unrelenting mating cycle that can have no sense of completion due to PZPs introduction.

Additionally, some competing stallions are successful in their bid for band mares due to the former band stallion becoming worn down from the constant challenges resulting in repetitive disturbances and impacts to complex social structures and herd dynamics because the herds are being placed in a constant state of flux due to PZP triggering these wholly unnatural cycles of behavior.

Under the section titled Purpose and Need, BLM states that implementation of the proposed action (use of fertility control) would provide for a more stable wild horse social structure.

What evidence, documentation, studies, monitoring, etc. can BLM provide that affirms this assertion to be true? As already explained, independent observations have detailed explicit and wide ranging negative impacts to wild horse populations and social structures, so what can BLM provide that quantifies this statement as more than BLMs opinion or imaginary conjecture?

PZP is cited as an experimental fertility control drug and the BLM has been in the process of administering it to many wild horse herds across the West.

Please provide references to studies completed or ongoing with regard to the noted direct and cumulative impacts of its *experimental use* with special emphasis on those available that are independent of BLM, not in "partnership" with BLM or other government funded personnel and that may have been independently peer reviewed.

Also, all references to the fertility drugs injected after the December 2003 removal operations make no reference to what fertility control drug was applied. Since the USDA has been in the process of developing other, more potent and long-lasting fertility control treatments, up to and including permanent sterilization, please specify if PZP was the fertility control drug administered to the NWHR wild horses or if one of these even more experimental drugs were used and if so, which one?

In regards to the minor variation presented in Alternative 2, where mares are treated with PZP but 75 stallions would be castrated and returned to the range, please cite and provide references where this form of fertility and population control measures has already been implemented.

Historically, male castration of all species causes changes in fundamental behavior patterns, most notably, severe decline in aggressive behaviors with marked increases in both passive and docile behavior characteristics.

What gelding herds has BLM or others involved in wild horse management monitored for impacts of this form of population control that has made BLM conclude that implementing this alternative is completely safe to wild horses and their behavior dynamics as a wildlife species dependent on acute survival mechanisms within their habitat and natural cycles?

Due to the somewhat restrictive nature of the Nevada Test & Training Range, where monitoring opportunities may be limited to both BLM and independent observers interested in recording and studying gelding herd dynamics, as well as any relative impacts to "normal" herd structures, why does BLM believe the NTTR is the proper place to implement a stallion castration program?

As for Alternative 3, the No Action "management plan", while this alternative is always included in wild horse removals proposals, its inclusion is a relatively moot point and not considered a reasonable management action alternative.

BLM makes great hoopla about how this alternative always fails to comply with federal laws, BLM policies, RAC Standards, or managing for the mandated thriving ecological balance. While most environmental assessments are clear that this alternatives inclusion is merely for comparison purposes, it also well documented that it is **not an option.**

Therefore, I believe BLM is lawfully required to address this lack of any real alternative in wild horse management actions through their present offering of an extremely narrow scope of limited alternatives that always reach the same outcome - **PZP <u>will be</u> injected on the Nevada Wild Horse Range mares**, **period, the end.**

At the very least, an alternative needs to be provided that will implement wild horse management actions that offer an *alternative* to fertility control injections, especially since, by BLMs own reports, it has proven to be relatively ineffective as a fertility control measure on the Nevada Wild Horse Range mares compounded by independent observation that it is extremely disruptive to wild horse herd structure, social dynamics and even herd health up to and including death.

Furthermore, the BLM has been in the process of implementing its national wild horse and burro management strategies of regular, periodic removals based on a 4-5 year cycles and the new 2004 AMLs established a population range that accommodates wild horse management actions in thriving ecological balance with other resources and other rangeland users that is independent of the use of fertility control on wild equid populations.

When combined with reported field observations that "*suggest one potential indirect impact of applying fertility control may be compensatory reproduction in year two or three which could offset the benefits of fertility control applications achieved in year one",* serious questions arise regarding the purpose or need for the implementation of fertility drug application for purposes of reproductive control.

Are there other impacts that are occurring to wild horse populations through these injections that BLM is attempting to covertly implement since the usefulness of fertility control injections is becoming questionable?

Perhaps the noted preponderance of “club footed foals” requiring veterinarian intervention in the NWHR wild horses that BLM offers only the *possibility* of occurring due to a recessive gene is in fact, birth defects as a direct result of fertility control injections on wild equid populations.

What evidence does BLM have that supports this assumption of a recessive gene versus birth defects occurring as a result of this still experimental drug?

BLM states that the removal of club footed horses and foals will be of high priority in the selective removals during the December 2007 roundups to help eliminate this trait.

Were they not also a high priority in the December 2003 removals?

While BLM assures the public that these life-threatening traits are strictly a result of a recessive gene BLMs selective removal policy will target and remedy through removals, how effective was this management tactic, based on monitoring reports, since 2003?

Can you offer legitimate written documentation to support this assertion that impacts were made through high priority selective removals that reduced incidences of clubfoot populations in the NWHR? Have they been increasing? What is the status and statistics BLM can provide on this significant factor in herd health?

This proposal is also deceiving the public through the sugarcoated phrase offered regarding the “removals” of club-footed horses and foals. Club footed horses were immediately euthanized at the trap sites during the Stone Cabin wild horse removals this past February.

Why aren’t you telling the public in plain language what “removed” foals means?

Since animals will be euthanized at the trap sites, no one will be able to examine the “club footed” wild horses on a restricted military range other than BLMs “approved” veterinarian to determine if this really is the reason wild horses and foals will be put down or if there is indeed unreported consequences of injecting experimental drugs into wild horse populations that are resulting in birth defects. (Assuming a veterinarian is present at all based on BLMs open-ended management plans presented in this assessment.)

Additionally, pardon the expression but, what kind of “horse manure” is BLM trying to sell with the statement under the No Action “Alternative” that *“lame foals would need to be captured and removed from the range for treatment at an estimated cost of about $500.00 per foal.”*

I happen to personally know that a “lame foal” was identified by BLM in the Red Rock HMA this past year and BLM did not provide any “veterinary care” to the foal, they monitored it to see if it would survive, which it did not.

A wild horse in the Spring Mountain area was identified by local residents as having an abscess that inhibited movement and restricted access to forage. Though the problem was easily correctable and local residents even volunteered to provide medical treatment, BLM told them that they would provide the medical treatment.

Except BLM lied because there was never any intention of providing medical treatment and BLM showed up later in the evening and was discovered after dark euthanizing the wild horse. They "explained" that the reason for their lying was they didn't want to "upset" anybody.

Besides personal knowledge that BLM does not provide medical treatment for "on the range horses" as well as being told that BLM euthanized wild horses for the domestically correctable condition of club-foot, it is also against BLM *policy* that dictates wild horses will be managed for "minimum feasibility" and that does not include capturing wild horses, providing medical treatment and returning them to the range.

BLM won't even provide water developments for wild horses due to the "minimum feasibility" policy so why in the world are they trying to sell this ridiculous notion that they are going out to the NTTR weekly and will spend $500.00 per foal for veterinary care if they aren't "captured" immediately?

Perhaps it may be a combination of the fertility drugs and/or the hazardous contaminants located in the military areas of use that are creating special physical deformities.

Has BLM done any sort of blood work that examines wild horse levels of toxins or contaminants that might be a result of their residence in a military use area? If so, when and how often? Would BLM include these reports in the Final Environmental Assessment for public or independent veterinarian review?

Has BLM compared fertility control injected blood from a NWHR wild horse against injected wild horse populations from a less potentially toxic environment to see if there is unexpected reactions occurring in the NWHR wild horses that other herds would not be susceptible too due to their lack of exposure to the unique environmental conditions presented in the NTTR?

There is research and studies that clearly show that unexpected reactions have happened in humans when they have been taking different medications for different physical conditions, producing a wide range of results that did not occur in the individual medications when they were tested. It was only when the medications were combined that unexpected and sometimes fatal results occurred.

REPRODUCTIVE RATES & WILD EQUID POPULATIONS

Reproduction Rates/Population Modeling

Contrary and opposing information is being provided in this assessment regarding projected reproduction rates and population levels that need to be addressed.

BLM covers reproductive rates, population objectives, and current population estimates at several locations throughout the assessment. However, the most detailed analysis is provided in the Population Modeling Appendix and the Summary Chart illustrated in Table 4. Average Population Size, Growth Rates, Next Projected Gather Year.

Noted problems and issues that need to be addressed include:

Alternative 1 (The Proposed Action):
Gather with Fertility Control. Release 120 mares, 180 studs.

a) BLM reports that the use of fertility control will produce wild horse reproduction rates averaging 8.7% in the Median Trials while the very Highest Trial reported a reproduction rate topping out at 14%.

Please explain how BLM is currently reporting that prior use of fertility control resulted in an *average* population growth reported at 22% when the fertility control in the Population Modeling Program states that reproduction rates will be reduced by 13.3% more than BLM actually noted in actual results.

In other words, if the implementation of fertility control is really capable of producing a Median reproduction rate of 8.7%, then why did BLM report an *average* of 22% over the last four years, which is also 8% higher than the Highest Trial run?

b) In the December 2003 removal operations, BLM released 348 mares and an estimated 172 stallions remaining on the range representing a higher proportion of females to males. In the Proposed Action, BLM is now opting to manage for a higher proportion of males to females.

Please explain the reasons behind both management strategies, the one already implemented and the one proposed, for comparison and evaluation purposes of effectiveness of management strategies.

Alternative 2:
Gather and fertility control. Release 150 mares, 75 studs and 75 geldings.

a) Somehow, the inclusion of 75 non-breeding wild horses actually caused an increase in reproduction rates versus a decline.

While BLM may state that the release of an additional 30 mares contributed to this higher level, not all mares become impregnated during the mating season and the standard rate applied is 40% of the breeding mare population will reproduce annually (20 mares out of a total population of 100 breeding adults assuming a 50/50 gender ratio).

This means only 12 more mares are actually contributing to reproduction rates within the NWHR and those mares, as well as all mares returned to the range, will be treated with fertility control injections based on the alternatives offered.

Can BLM please explain why the inclusion of a management plan that will implement 75 wild horses not contributing to breeding *and* the injections of fertility control treatments applied to both alternatives resulted in a higher reproduction rate in the NWHR in Alternative 2 versus Alternative 1?

Also, can BLM illustrate how that actually works versus graphs filled with squiggly colored lines that fail to separate or define specific details as to how these mathematically questionable conclusions were arrived at?

b) During the Median Trial, BLM padded the starting population by inserting a wild horse population that was over the projected removal numbers and post-gather population by 44-64 wild horses, causing undue increases in projected reproduction rates.

Furthermore, the actual remaining *breeding population* will not be 300-320 wild horses as BLM implies but is actually ranges from 225-245. This population corresponds to the Lowest Trial wild horse population input used at 232 total animals and based on the highly questionable results of using the Population Modeling software; the average growth rate for *this* population is cited as 1.3%.

This growth rate is so negligible that, when combined with the high rates of club-footed foals being produced in the NWHR, the reproduction abilities of the NWHR horses are teetering on the edge of population growth reversal through the implementation of this “alternative”.

Please address BLMs reported results of using a wild horse population of 232 in the Population Modeling Trial Runs that analyzes and addresses the direct and cumulative impacts to the genetic viability of self-sustaining populations projected to achieve a 1.3% population growth rate if Alternative 2 is implemented.

Alternative 3 (No Action):
No Gather.

The BLM states the Population Modeling Software was set at parameters that included only capturing 90% of the population. Yet, during the Trial Runs under this "management" alternative, the population input for all Trials except the first, Lowest Trial, used a wild horse population of 1,120 every time, the exact estimate of the current population of wild horses within the NWHR.

Why didn't the BLM try inputs of the projected population plus an additional 10% left out on the range to help compensate and provide accurate wild horse numbers for future population management under this alternative?

It's as if BLM KNOWS exactly how many wild horses are out there on the range and the "projections" done in the other two alternatives are adding a 10% variable that does not exist, further reducing wild horse population numbers and skewing results of the first two alternatives.

Please address why BLM used the exact estimated population high in the trial runs instead of compensatory population levels.

<u>Wild Equid Populations</u>

a) Due to the reported incidences of club-footed horses within the NWHR, what is the known mortality rate of wild horse populations due to this influence, since it especially impacts vulnerable foals?

b) In February of this year, the Battle Mountain Field Office presented an environmental assessment and removal proposal for the Stone Cabin Complex wild horses, which is adjacent to the NWHR, and reported genetic interchanges between the Stone Cabin Complex and the NWHR wild horses.

The Battle Mountain Field Office felt these exchanges were significant enough to include the NWHR acreage and AMLs in their assessment that determined the genetic viability being stabilized through projected meta-population influences of these two areas.

Based on the Battle Mountain's documented field observations, what percentage of the NWHR and Stone Cabin Complex wild horse populations has the Las Vegas Field Office noted and accounted for in this assessment regarding migratory routes, populations fluctuations (increases/decreases) and the associative impacts to their proposed management plans and rangeland resource utilization patterns offered in this proposal?

The Las Vegas Field Office has documented specific migratory routes utilized by wild horse herds within the NWHR depending on summer/winter and water availability. Since the Las Vegas Field Office seems to prefer December NWHR removals, please identify specific noted migratory dynamics with the Stone Cabin Complex and NWHR wild horse populations during this time period.

Conflicting Population Reports

BLM claims that 550 wild horses were returned after the December 2003 removal operations with an estimated 50 wild horses that avoided capture-leaving 600 total out on the range.

In the recently published Draft Environmental Assessment for the Integrated Natural Resource Management Plan, Nellis Air Force Base and Nevada Test and training Range, NV released in May 2007, the wild horse population was reported to be 530 total remaining wild horses after the December 2003 removals.

BLM reported in their FY 2005 Herd Statistics that the population was 780.

The Air Force reported a 2005 census counted 880 wild horses.

BLM reported in their FY 2006 Herd Statistics that the population was 928.

BLM reported in their FY 2007 Herd Statistics that wild horse population was 1,114 and a 20% foaling rate brings the wild horse population up to 1,336 as of July 1, 2007.

Of course, 178 wild horses were removed during an emergency roundup between July 6-8 and an additional 71 wild horses recently died bringing the BLM current estimated total population to 1,087 (including foals) while the Air Force numbers (using the 24% reproduction rate) bring the current estimated population to 991 (including foals).

At no time during all these reported population figures does BLM identify reproduction rates at anything significantly less than 20%, despite prior use of fertility control injections and between 2004 and 2005, BLM claims that the NWHR demonstrated a 30% reproduction rate.

The Air Force population figures identify approximately 70 wild horses less than BLM reported after the December 2003 removal operations and using their figures, wild horse populations are approximately 100 less than BLM is currently reporting.

Genetic Viability

The Las Vegas Field Office reports that results of genetic tests conducted on the NWHR wild horses indicated strong Spanish mustang ancestry.

BLM is aware that this unique genetic lineage is now extinct in Spain, correct?

When BLM examines cumulative impacts regarding their proposed management actions including removals, injecting experimental fertility drugs, reducing genetic viability through the introduction of a non-breeding population of geldings, recent reductions in allowable wild horse populations through new AMLs established at 50% less than the former management plans, does BLM have any intention of examining the total population of Spanish mustangs still remaining in the wild? In captivity through adoptions or other breeding programs?

To the best of my knowledge, there is not a single wild Spanish mustang population that meets scientifically established criteria for minimum population levels and genetically acceptable standards to support self-sustaining wild populations.

Does BLM consider an examination of now rare bloodlines outside the scope of their jurisdiction, management plans, administrations, policies, laws and regulations?

After over 30 years of wild horse and burro management based on “in-depth” monitoring and documentation, please report on the known wild populations still remaining of the Spanish mustangs that once roamed the American landscape by the hundreds of thousands.

How many Spanish mustangs is BLM aware still remaining in the wild? What is the purest bloodline population based on BLMs genetic tests conducted on America’s wild horse populations?

Does BLM believe that addressing the cumulative impacts of national wild horse removals and establishing non-genetically viable AMLs fails to qualify for consideration during these proposed management actions? There are millions of acres of rangeland and resources that BLM manages. How many Spanish mustangs does BLM manage?

What is the lowest population of Spanish mustangs that BLM believes should trigger significant concern for population levels that would initiate priority management actions to protect and preserve them?

While BLM usually only addresses site specific analysis of current proposals based on individual state run management objectives, the management of wild horses and burros on public lands is a federally coordinated strategy that is prohibited from ignoring cumulative impacts on a national level. BLM cannot claim that the only objectives it will consider are dictated by BLM State Directors or individual field offices in their application of wild horse and burro management actions without violating a national federal public law.

In the Proposed Nevada Test & Training Range Resource Management Plan and Environmental Impact Statement published in May 2003, no mention of "strong Spanish ancestry" and its preservation was cited as a consideration for establishing AMLs within the plan, obviously because the results of NWHR genetic tests were not yet available – but they are now.

BLM has created a "new" policy regarding sustaining genetically viable herds, which is also included in this proposal. The "plan" is to introduce a few wild horses from other areas to supplement the population. In this plan, BLM plans to use wild horses from Stone Cabin if necessary.

Please provide what legal precedence supports this new management policy as the Act clearly states that wild horse and burros are not to be distributed to areas outside of where they were identified at the passage of the Act, BLM policy and IBLA ruling require that BLM manage herds at an optimum number for *self-sustaining* populations (not supplemented populations) and furthermore, this new strategy fails to acknowledge the unique genetic markers of various herds, identified for their historical purposes.

Is BLM attempting to circumvent law and policy by trying to make this acceptable through claiming that *any* horse will do (when that is not the case at all) and allowing AMLs to be established based on the removal of the necessary resources critical for their survival as self-sustaining populations, reallocating these resources to different uses and then stating, "Oh, we will just add another horse or two if we need too so livestock or big game species can have these resources instead".

Additionally, in one instance that I know of, the Las Vegas BLM has already gone back on their word regarding the previous "promises" to supplement the Red Rock HMA wild populations with a few wild horses removed from the Spring Mountain Complex removals conducted this past January.

It was interesting to watch the faces of the people BLM had made this prior promise to as they were told by BLM that they had changed their minds weren't going to do it after all. How many times is that going to happen under this newly invented *policy*?

WILD HORSE MANAGEMENT

This section is included because the proposed actions are part of a comprehensive strategy employed for the purpose of wild horse *management* versus exclusive reliance on wild horse removals as the sole focus of management actions to be implemented by BLM.

There are considerable lawful mandates and policies regarding wild horse and burro management actions that must be implemented to achieve the goal and *intent* of the Wild Free-Roaming Horse and Burro Act, which demand that management actions provide for protection of both wild horse and burro populations and their habitat so that they may be preserved for future generations.

While it is understood that this is not the exclusive consideration of BLM, as they have been charged with a variety of missions under multiple-use mandates and laws, too often in examining wild horse and burro management proposals, it seems that overall, BLM fails to consider or implement management actions that actually support the intent of the Act, choosing instead to rely exclusively on it removal policies versus coordinated strategies that are designed to assure successful wild horse and burro preservation.

Again, the current proposal follows this pattern, addressing no other management options or considerations other than wild horse removals to "protect the range and themselves".

The pattern is also being repeated in this assessment, just like in many prior proposals BLM publishes, that "management strategies" proposed in prior documents are never implemented, followed up on, or publicly reported.

Any attempts by the public to discern the effects of the "promised" implementation of prior wild horse and burro management strategies, options, alternatives, suggestions, etc. is *always* deemed "beyond the scope of the proposal" since BLM is only interested in one outcome – wild horse and burro removals.

In the 2003 Resource Management Plan that established the new AMLs for the NWHR wild horses, a variety of management options and considerations were proposed for implementation.

What documents has BLM publicly released since the ROD was issued in 2004 that address and report on any achievements of those previously cited management goals?

Since this is a wild horse management action, are other wild horse management actions appropriate for inclusion and examination within this assessment? "Yes" is clearly the answer, since BLM examines effects of population control measures through stress to individual animals as well as herd dynamics of being driven by helicopter, captured and removed, fertility control applications and their effects, water availability, climactic conditions over extended durations, vegetative resources, rangeland health, wildlife status and needs, cultural resources, financial analysis of one of the alternatives, veterinary care, trapping methods, genetic viability, herd health, migratory routes, fencing impacts, and military impacts and needs within the context of all wild horse management actions that are related.

So with such a wide variety of factors presented to justify wild horse removals as a necessary management action, why would requesting follow up information, current data, monitoring reports, questions about results, or the public wanting some point or juncture where BLM becomes accountability for prior rhetoric, be deemed by BLM to be "beyond the scope" of wild horse "management" actions?

If BLM has only to address the issue that wild horse populations have exceeded established AMLs, why are they bothering to include any of the other information presented within this proposal?

Because their proposed actions are legally mandated to examine multiple factors in the implementation of their management, including past, present and reasonably foreseeable future results that examines direct, indirect and cumulative impacts.

Therefore, while BLM continues to keep discouraging the public from questions they do not want to address, the public is legally entitled to ask these questions and as well as expecting reasonable answers. Thus, the inclusion of a section titled "Wild Horse Management" is both appropriate and necessary in relation to prior documents released regarding management actions and intentions put forth by the Las Vegas Field Office and the NWHR wild horse population.

Prior documents indicate that additional management actions have been proposed that were designed to achieve greater wild horse health, better resource distribution and availability, reduction in impacts to rangeland utilization levels that effect all species, as well as better coordination for military operations within the NTTR.

These actions were presented to the public in the past under the guise that, through BLMs implementation of *other management actions*, balanced wild horse populations would be achieved, rangeland health and resources would be protected, necessary habitat requirements for wild horse populations and all species within the proposal areas would be assured, all while continuing to preserve and protect wild horse populations for the enjoyment of future generations.

These management actions did not rely solely on wild horse removals to compensate for failed strategies or lack of there implementation. Yet, not *one* of these formerly proposed management actions was addressed, included, or reported on in this assessment since BLM initially presented them to the public over 4-5 years ago during the Draft version of the RMP. Why is that?

At what point does BLM believe it is required to begin reporting on other wild horse management strategies it believed and reported were necessary to preserve the thriving ecological balance and health of wild horse populations? An additional 5-15 years from now? BLM has yet to report on them for 4 years, so perhaps BLM believes a total of 9 years is appropriate before addressing these issues?

While kudos must be given to BLM for being able to reduce the NWHR wild horse population from 10,000 to 225-320, perhaps they should consider that NOW is an appropriate time to publicly report on what is occurring in the NWHR and our remaining handful of wild horses.

AMLs

Yes, yes, BLM tries to discourage any public examination of AMLs in this proposal, wanting only to mention them for the singular purpose to exert BLMs authority to remove wild horses from the range.

This discouragement is clearly illustrated through the inclusion of this statement located Under Alternatives Considered But Eliminated From Further Analysis, Changing the Current Established AMLs.

BLM states:
"The current AML of 300-500 wild horses was established in the July 2004 ROD for the Approved Nevada Test and Training Range RMP/FEIS (page 14). Because a gather to remove excess wild horses has not occurred since that time, BLM has not had an opportunity to implement the AML and monitor its effectiveness. By removing wild horse numbers in excess of the AML, the BLM will have an opportunity to complete additional monitoring over the next five to ten year period and to make adjustments in the AML number (either up or down), if needed, based on resource monitoring results. [3] Changing the AML prior to completing the necessary monitoring, in-depth analysis, and compliance with NEPA would be premature, and contrary to law, regulation and policy. Therefore, this alternative was not considered in detail."

3- This approach is consistent with the Interior Board of Land Appeals ruling (109 IBLA 120) which states: "We note that the Secretary, in his June 1981 letter, indicates that an appropriate determination of the number of wild horses to be permitted on the public range, consistent with Section 3(b) of the Act, requires relying on an intensive monitoring program involving studies of grazing utilization, trend in range condition, actual use and climatic factors…."

There are so many holes in this statement, contradictory information presented within the rest of this assessment, as well as the referenced July 2004 ROD for the RMP, that I barely know where to start.

First off, I have no doubt that the day the Interior Board of Land Appeals came forth with the ruling that BLM needed no other reason to justify wild horse and burro removals other than exceeding of established AML, there was joyous celebration on all levels of the WH&B Program because now, all BLM had to do was get the AMLs established and no further work or reporting would be required.

Having now seen a handful of proposals that revealed just exactly *how* BLM slides through many of these AMLs based on "in-depth" monitoring of resources and utilization levels, the established AML for a wild horse or burro herd has become absolutely meaningless in my eyes.

Of course, what my eyes see have no meaning to BLM either so I guess we are even.

What is the reality behind what and how the new AMLs were set for the NWHR since this is the foundation of BLMs authority to cite them as "excessive"?

Background Information and Historical Overview

The Nevada Wild Horse Range was established in June 1962 in response to America's overwhelming love of wild horses and was created through a cooperative agreement between the BLM Nevada State Director and the Commander of Nellis Air Force Base. The original designated habitat covered 435,00 acres but was reduced to 394,000 acres in June of 1965.

In 1971, BLM inherited the NWHR due to the passage of the Wild Free-Roaming Horse and Burro Act and in 1974, a new cooperative agreement was established canceling all other previous agreements regarding the wild horses and their management o the NWHR.

Though censusing and management of wild burro populations located on the NWHR was identified in the 1974 agreement, the federally protected status of the NWHR burros was somehow circumvented and in 1993, the BLM removed 126 wild burros and mules, which was essentially the last of the wild burro populations, and continues to remove any wild burros that migrate on to the NWHR to this day.

In 1989, BLM established a Herd Management Plan for the NWHR as well as establishing an AML of 2,000 based on the amount of forage and water available as a result of BLMs "in depth" monitoring. In 1993, wild horse populations peaked with approximately 10,000 roaming the range.

The proper management of wild horses on a restricted military base has always been an issue for BLM since lack of access to the range and wild horse populations had complicated and limited program effectiveness, had posed serious threats to wild horse health, often times critically stressed populations due to BLMs inability to implement *any* management actions at all (including removals) due to the highly restrictive nature of the ongoing military operations.

On January 29, 1997, BLM published an article regarding a Wild Horse and Burro Evaluation for the NWHR with the "team" that conducted the evaluation recommended that BLM not be the responsible agency for managing the horses on the NWHR and other areas on Nellis Air Force Base.

Additional recommendations included very specific coordination with multiple agencies to clearly define roles and boundaries regarding wild horses management, responsible parties and jurisdiction, as well as wanting clear guidelines for funding of who did what and where.

Despite all these obstacles, to BLMs credit, they began to explore solutions for a viable management plan with all responsible and coordinating government agencies that did not entail the complete elimination of the NWHR wild horses as the Nevada Commission for the Preservation of Wild Horses recently advocated as an option. These agencies were the Department Of Energy (DOE), Department Of Defense (DOD), United States Fish & Wildlife Service (USFWS), and Nevada Department Of Wildlife (NDOW).

At the time of this evaluation, the NWHR wild horse population was estimated to be approximately 5,000 wild horses and an AML was recommended with a maximum wild horse population of 1,000.

The "Team" that did this evaluation also stated that:
"The evaluation also expressed additional concerns that previous gathers manipulated the age structure to create a population with an approximate age of 14 years old, excluding the foal crop. These gathers disrupted normal age band structures for herd interaction, causing additional stress to already critically stressed animals. Also, there are some concerns regarding the sex ratios of the herd."

Notice how no details as to what the implications and recorded impacts of these profound statements might be? Will anyone ever know what really goes on with the NWHR wild horses?

The most recent AML was set by the Record of Decision (ROD) for the NTTR Resource Management Plan (RMP) EIS at 300-500 wild horses.

During the drafting of this RMP, BLM presented evidence that in 1971, based on historical records, that the original Herd Area actually covered approximately 1.3 million acres and reset the Herd Area boundaries in the 2004 ROD.

This change in acreage was protested by Nevada Department Of Wildlife until the protest was dismissed in full by the BLM Director and the Final RMP and ROD was issued in July 2004.

<u>Core Management Areas & Historical Use</u>

Despite this massive increase in acreage, the actual increase in habitat for the NWHR wild horses was negligible, as a "core area" for management was established within the Herd Area that only increased the actual "management area" to 474,370 acres. The current management plan based AML on water availability within this core area, not the entire 1.3 million acres of the new Herd Area boundaries.

Based on the limited maps available for the NWHR due to the military's restricted information around the area, it appears that the purpose of "suddenly" redefining the Herd Area acreage was to allow BLM to have more flexibility in establishing a management area for wild horses that served the purpose of marginally increasing access by BLM to the HMA area as well as moving wild horse populations further away from military operations.

The new boundaries radically altered the historical wild horse use areas, which initially were of a more narrow nature that actually shared boundaries with the Nevada Test Site. The new "core management area" removed several historical water sources by creating new boundaries that were of a more horizontal nature and attempts to spread the wild horse populations away from the Nevada Test Site in a new direction.

BLM identified three main herds and their migratory routes in the NWHR. The first is located in Kawich Valley, the second in the Cactus Flat area and the third in the vicinity of Stonewall and Mud Lake. (The adjacent Stonewall HMA is also being proposed for a zero wild horse use decision.)

The BLM has known migratory routes historically used by the wild horses identified within these areas but no maps were provided in either the Final 2004 RMP or this current Preliminary EA that identified these known herd areas or their known migratory routes.

The failure to properly identify these herds and their migration patterns is extremely important in that, BLMs agreement with the DOD under the 2004 RMP states that wild horses will be allowed "incidental use" of water and forage outside the core management area as long as they move back into the core area.

Yet, no records have yet been found or provided as to what these historical and current migratory patterns are, what water sources are included and historically utilized by wild horses, if the core area was established with the knowledge that wild horses would migrate and not return (unfortunately, BLM has no way to tell the wild horses that even if an area has resources to support the wild horse populations, they are not allowed to stay), and how many of the identified water sources within the NWHR are of higher quality outside the core area boundaries.

Please include in the Final EA maps of the three predominate wild horse herds areas of use as identified by BLM; the Kawich Valley, Cactus Flat and Stonewall herds and maps detailing their seasonal movements, both within the core area and those known to exist outside the new boundaries.

Also please include maps that highlight these herds in the "old" historical management area as well as well so that an examination can be made of water sources removed from wild horse use in 2004 due to the implementation of the new RMP and ROD.

Defining AMLs

During the Draft Management Plan, Alternative B (The Proposed Action) cited establishing an AML of 600-1000. When the Final RMP and ROD was released in 2004, Alternative B, still the Proposed Action that was approved and implemented, suddenly slashed the wild horse AML by 50%, dropping it from 600-1,000 to 300-500.

So the NWHR wild horse AML has gone from 2,000 down to 1,000 and then down again to 500 with the current population (currently estimated by BLM at around 1,100) is being proclaimed as totally excessive and causing rangeland degradation, excessive utilization and posing threats to the "thriving ecological balance" at population levels that BLM use to claim were "appropriate".

The establishment of this AML was cited by BLM as conforming to water availability as well as preventing any conflicts between military operations and wild horse populations.

Water

BLM states under Background Information (page 2) "*the AML is the optimum number which can graze based on detailed analysis of the available water, the military's operations mission, and other uses of the water resources.*" (Emphasis added)

On page 3-48, of the May 2003 Proposed NTTR RMP and Final EIS, BLM states *"that the Air Force has constructed exclosures around some seeps and springs located outside the current Wild Horse Management Area to eliminate all grazing of the riparian area by horses. The intent is to allow the riparian vegetation to fully express itself and improve habitat for "other" types of wildlife. This effort* ***did not include piping any water to locations outside the exclosures so that the horses still have a water source.***" (Emphasis added).

In section 4.4.10, Wild Horse and Burro Management, (page 4-9), of the Draft RMP, BLM stated that "*20 perennial water sources (springs, seeps, troughs) had been identified within the planning area,* ***but most of the forage and most of the reliable water sources are outside the HMA*** *identified in the 1992 Record of Decision."*

They went on to say that 14 of the 20 water sources in the newly proposed "core area" and would be available to the wild horses – a loss of 6 water sources and no mention is made if these were the "more reliable ones".

In determining AML, BLM used a Table located on page F-2, Water Sources Within Core Area, that listed 20 water sources and included Flow Rates at Gallons Per Minute (GPM), whether they were fenced, their function, vegetative use and the percentage of water allocated for wild horse use, established at 50% of the available water so that the other 50% would be available for "other wildlife" in the area.

The total Flow Rates were reported at 10.9 Gallons Per Minute but no reference was provided as to when these rates were established, if they were measured during drought years or abundant years, 6 water sources were fenced, 4 of which rated in the top producers of highest flow rates with no water access provided for wild horses to mitigate this loss of a critical habitat component.

The 50% use level also showed that up to 734 wild horses could be managed at that allocation.

Management plans included in the RMP stated that BLM would apply for water rights to try and offset the loss of access to a variety of water sources, which included the removal of historical sources from the old Herd Management Area as well as the removal of 6 water sources through fencing.

Well records from the Nevada Division of Water Resources indicate that there is nine permitted water-supply wells on the NTTR. My guess is these are most likely located in the old historical grazing allotments that are no longer managed in the NTTR. Please provide a map that details the location of these nine wells in the Final EA for the Nellis Wild Horse Management Plan and Removal Proposal.

Over the course of the last three years, has BLM followed up on this "plan"?

Please provide the status of BLMs application for water rights in the NTTR that was proposed to mitigate the radical restructuring of core management areas that removed a significant amount of water sources from wild horse use (as indicated by maps of water sources in the NTTR) and the fencing of additional critical water sources provided further limitation for wild horse use.

In a letter from Nevada State Director, Ron Wenker dated on June 13, 2007; Director Wenker states *"BLM generally avoids developing artificial water sources (such as wells) for wild horses and burros"*

So perhaps you can explain this to me.

First, natural surface water sources that were historically used by wild horse populations were fenced and no water was provided to them outside the exclosures. Then a radical alteration in management boundaries was recently approved that include withdrawal of more historical water sources. Then the water sources that were remaining in the core planning area were identified as being "less functional" and needed repair.

In order to compensate for all this man made activity that disrupted and withdrew critical habitat components, the BLM proposes to apply for water rights to wells in their 2004 management plans except it would appear they have yet to follow through on this mitigation measure.

Then, in 2007, the State Director states that BLM generally avoids this sort of management strategy. Was that also the policy when BLM was stating that they would apply for water rights during the 2004 RMP? Did something change since then? Was it always this way and BLMs proposed management plan to "compensate" for all their "planning impacts" really meant they had no intention or legal means to follow through on this mitigation measure?

Additionally, BLM keeps saying that they try not to "develop" any sort of water sources for wild horses and burros. Yet historical water sources are being eliminated all the time through agriculture use and development that has resulted in water tables dropping and drying up these critical habitat resources.

Mans "management" and activities are eliminating these critical habitat components and BLM refuses to compensate for this by applying a double standard and "management criteria" to wild horses and burros that no other wildlife species could survive under. Every other wildlife species is entitled to supplemental water developments, water hauling, and exclusive use of springs, etc. so why does BLM establish a different policy for wild horses and burros, especially so when they have been established as a federally protected species?

Furthermore, when BLM cites "minimum feasibility", they are aware that this means, the minimum management necessary to *preserve and protect wild horses and burro in their wild state,* are they not?

If the *intent* of the Wild Free Roaming Horse and Burro Act was to "manage at minimum feasibility", it would have never been passed into federal law because what could be more minimal than allowing wild horses and burro to continue to be fast-disappearing?

Emergency Water Hauling

In this Preliminary Assessment, Under Alternatives Considered But Eliminated From Further Analysis, BLM dismisses the analysis of Providing Supplemental Feed and Water based on this statement:

"Providing supplemental feed (hay) or hauling water (other than during a short-term emergency situation) does not meet the definition of minimum feasibly management and is inconsistent with current law, regulation and policy. Refer to 43 CFR 4710.4"

Then in other areas of the Preliminary EA, BLM states that the military has been providing supplemental water through water hauling for *two years*.

How is that a short-term emergency or comply with 43 CFR 4710.4"?

Then BLM goes on to say that if the No Action Alternative is implemented, an additional $12,000 per month will be spent providing this supplemental water.

Isn't that also against BLM policy and regulation? Does that include every month or just summer months? Only during drought conditions or is this the result of the new core management areas boundaries?

Wouldn't the *first* year the military starting supplementing water indicate that something is wrong with the current "management" strategies BLM just approved of that need to be addressed? I mean, according to BLMs water flow chart, water availability just within the 20 springs identified for wild horse use was capable of sustaining 1,440 wild horses. There hasn't been that many on the NWHR for two solid years.

BLM also states in this Preliminary Environmental Assessment that, in addition to drought conditions, "*older/less functional water developments …..''have depleted the available water"*

During the Draft RMP of 2003, BLM identified the need to repair these less functional water systems. It has been 3 years since the ROD was approved. How many of these have actually been repaired since BLM stated this was part of their "comprehensive" management plans for wild horse and rangeland health *besides* just removing them?

There is definitely one area that was recently fixed; the Cedar Well trough were newspapers reported that BLM crews *re-established a minimal flow* but it was not sufficient to prevent an emergency gather.

So there is no doubt that, at least in this one recorded instance, BLMs failure to implement *other* management strategies for proper wild horse management in the NTTR for over 3 years, resulted in critical stress to wild horse populations that resulted in more of BLMs preferred management tactics – wait until the situation develops into a crisis and *then* follow up or respond to prior management plans.

One would think that if the military has been hauling water to wild horse populations starting in 2005, BLM would have made it a priority to get out on the NWHR and *at least* begin repairing these older, less functional water systems.

Again, how many other "older/less functional water developments" do wild horses depend on that BLM has yet to implement previous management plans to assure proper water availability?

According to the recently released Draft Environmental Assessment for the Integrated Natural Resource Management Plan, Nellis Air Force Base and Nevada Test and training Range, NV released in May 2007, 101 surface water sources were identified in the NTTR area.

BLM identified 14 water sources that wild horses would still be able to utilize in the 2004 RMP and ROD but this Preliminary EA is now only citing 5 water sources.

BLM states in the Preliminary EA that:

"Continuing drought is limiting the amount of water available for wild horse use. Of the five key water sources used by wild horses, Cedar Well and the north gate pond are completely dry; water at Cactus Spring and Silverbow is very low. As a result, the Air Force has been supplementing water at several locations since July 2005. This has resulted in heavy-severe use within ½ mile of the available water sources and heavy use in a ½-3 mile circumference of the available water. Due to the lack of winter moisture, utilization by wild horses has continued to concentrate on about 1/3 of their summer range with minimal use of their winter range during the last three year period. Presently wild horses are traveling 2-8 miles to obtain forage and water, which is leading to observations of increasing lameness, particularly in foals."

Now the available water sources BLM originally reported and identified in 2003 has been reduced by 15, a 75% reduction in available water in just 4 years.

But it gets even worse. No mention in this assessment is made of the Proposed Action in the Draft Environmental Assessment for the Integrated Natural Resource Management Plan, Nellis Air Force Base and Nevada Test and training Range, NV released in May 2007.

Reading like a dream book for a big horn sheep and big game species wish list, the Integrated Natural Resource Management Plan is coordinating with USFWS (who just love wild horses) to fence off a majority of the natural surface water sources in the NTTR to prevent any access by wild horse populations. This is the most significant component of action to be taken throughout the entire Draft Assessment and seems to be its primary purpose.

So how many other water restrictions are being planned for the NWHR wild horses that BLM isn't bothering to tell anyone in the wild horse loving community about?

In the current Preliminary Assessment management plan that only wishes to address wild horse removals and fertility injections, BLM is claiming that *"this shortage of water has led to wild horses concentrating around the few remaining water sources, many of which are located adjacent to roads critical to military operations"*.

Based on the evidence I have found, it would seem that the "water shortage" is a direct result of BLMs strategic management plans or the lack of them, that have created this current and ongoing "crisis" for wild horse populations and rangeland health.

During the next removal proposal scheduled in 2014, will the water availability have been reduced to one source so that BLM can continue to say monitoring data suggests heavy use around the lone riparian area they have left for wild horses in the NWHR? And will BLM continue to request that the public not address the issue of "established" AMLs?

WILDLIFE

The Table that provided Flow Rates for the 20 water sources indicated that water availability at 100% use would support a wild horse population of 1,440 animals. Water allocations were only provided for wild horses at 50% of the output so that water would still be available for the other wildlife, predominately the pronghorn antelope established within the NWHR area.

While BLM does not wish to address wildlife populations or status, hoping to restrict all focus on *why* the wild horses need to be removed, the Draft Environmental Assessment for the Integrated Natural Resource Management Plan, Nellis Air Force Base and Nevada Test and training Range, NV released in May 2007 stated that wildlife populations were continuing to expand on every area of the NTTR, though no population estimates have been provided in any of the documents I have researched regarding the area or this proposal.

Wildlife management is occurring throughout the NTTR while wild horses are being confined to only one third of the area. Wildlife has access to all 101 identified water sources yet wild horses are still required to split their 20 water sources equally (or is it 14 water sources or is it just 5?).

Wild horses are being reported as traveling 2-8 miles a day surrounding the available water sources. Pronghorn antelope, the dominant big game species in the NWHR, only travel 1-2 miles a day.

Nevada pronghorn populations have grown to outnumber wild horse populations by 2-1 and their current state management objectives exceed the entire national AML for wild horse use throughout the West.

Big horn sheep, another wildlife species that is cited as requiring "special consideration" within the NWHR, was estimated at numbering over 50,000 (just Desert big horn) in an article published this last July, and they now number twice as many as the entire national AML for wild horse populations throughout the West.

BLM only wants to bring up the "thriving ecological balance" if it suits their purposes, specifically reducing and removing wild horse or burro populations from their federally protected habitat.

Just like in Table 1., BLM cites the need to remove wild horses because *"Competition among wildlife and wild horses for available forage and water would escalate as wild horse population size more than doubles over the next 3-5 years."*

Yet they never want to discuss the success of wild life management plans that have caused populations to constantly increase, population objectives that are continually being redefined *upwards*, greater pressure being exerted on resources due to their constant expansions and reintroductions.

The public is expected to understand when BLM removes wild horse habitat, withdraws their critical resources from use, zeros out wild populations completely, issues AMLs that are no longer genetically viable, allocates 90% or more forage or water to "other users", issues management plans that protect revenue generating big game species (aka, wildlife) at the expense of the wild horse or burro populations or removes them by the thousands to achieve a balance they never want to discuss.

While wild horse and burro AMLs are expected to "fluctuate" with the changing needs of the environment, BLM doesn't want to discuss how much has changed in other multiple-use areas, that have resulted in putting wild horse and burro populations at risk from inbreeding, starvation, dehydration, entrapment, and the only "feasible management plans" being implemented seem to center around their constant reductions and removals.

CAPTURE METHODS

The BLM included in this Preliminary Environmental Assessment, Under Alternatives Considered But Eliminated From Further Analysis the issue of bait or water trapping.

Bait and/or Water Trapping.
"An option considered was relying primarily on water and/or bait trapping as the primary gather/removal method for the NWHR. Due to the size and complexity of the NWHR and herd, bait and/or water trapping would be expected to capture 50% or fewer of the excess wild horses given a similar operations time frame (20 days) as compared to helicopter drive trapping which would result in capturing about 90-95% of the excess wild horses. As a result, bait and/or water trapping would not achieve the purpose and need and would be in direct conflict with the military's operations mission. Therefore, this alternative was eliminated from detailed analysis in the environmental assessment."

Will BLM please address, if this analysis was eliminated from analysis yet BLM is stating that foals are currently exhibiting lameness due to having to walk 2-8 miles for forage, how does BLM plan to mitigate the impacts to club-footed foals being driven by helicopter for 2-8 miles?

If it is necessary to provide medical treatment to them, don't you think that driving them by helicopter might cause excessive injuries, suffering and inhumane treatment?

Or will that only become an issue *after* you drive them and capture them? Will BLM report the foals that have to be put down by this removal method through their refusal to consider bait trapping as "non-gather related" and merely filed under "Chronic Health Conditions"? Does BLM believe their mothers will slow down for them while the helicopter is driving them? Is BLM planning on leaving the foals tied up on the range like Cattoor did at Sheldon in 2006? Is BLM not concerned about this because of the restricted public access on the military range that will prevent the public from capturing photos of dead foals strewn about the landscape like they were able to photograph during the 2006 Sheldon removals?

Or is humane treatment not a concern to the Las Vegas Field Office since there was no concerns about driving the "emergency gather" wild horses during record tying heat?

There seemed to be no alternatives or discussion about the impacts this will have to the club-footed foals so I'm just wondering what BLMs plan is and why they were so quick to eliminate the bait/lure trapping from their analysis given the circumstances?

FINANCIAL ANALYSIS

I must confess, it is good to see BLM finally examine financial impacts of proposals and alternatives through citing Alternative 2 had the potential of saving the National Wild Horse & Burro Program about $25,000 per year for the next 5-15 years.

Having previously been told all requests for financial information, analysis and impacts regarding wild horse and burro management is "beyond the scope of the proposal", it is good to see that it only took $40 million a year (and rising) and reduced availability in funds for BLM to finally consider inclusion of financial information about how it is handling public funds as they attempt to explore the wisest courses of actions in their management and administrations.

Aside from that, how did BLM arrive at the savings of $25,000 per year through the implementation of this Alternative 2? Please provide a breakdown of this information for public review.

Since BLM is now willing to consider analysis of the financial impacts of their proposals and alternatives, what is the estimated cost of the using helicopters to capture and remove the estimated 800-820 wild horses on the NWHR?

What is the estimated cost of using Bait/Lure Trapping methods during the same 20-day period the helicopter removals would take that would only remove about 50% of the current population?

What is the difference in savings between using the Bait/Lure Trapping method of 400 wild horse removal rate versus the helicopter rate, processing and containment of the additional 400-420 wild horses over the course of the next year?

What is the estimated cost of repairing the old and less functional water developments?

What is the cost of filing for water rights on the NWHR?

FEDERAL COMPLIANCE

NEPA

The fact that no other alternative is provided other than the use of fertility control injections in mares, combined with the fact that little information has been offered as to the impacts of previous injections to both mares or foals is disturbing.

All these factors indicate that the current proposal and alternatives offered by BLM fail NEPA adequacy for providing a reasonable range of alternatives.

For example, in Alternative 2, BLM admits this strategy does not benefit wild horses because it lowers the genetic viability of the remaining wild horse population because 75 wild horses are no longer capable of contributing to self-sustaining populations and will only contribute to rangeland and resource utilization.

The actually true value of the remaining wild horse population is reduced to managing a population whose AML ranges from 225-425, not 300-500, as well as causing the AML of the genetically viable populations to be artificially inflated and triggered for removals.

This alternative does nothing to further rangeland health or reduce resource consumption, its noted impacts are only to contributing to reduced herd viability and future wild horse preservation on the NWHR with the only benefit being cited as saving money.

Other alternative should be included that provide financial analysis, which allow comprehensive management plans that will be of benefit now and for future long-term management benefits of self-sustaining wild horse populations.

Under the section titled, Decision to Be Made, BLM only identifies the Proposed Action in its examination of impacts and effects by stating, *"the Proposed Action does not establish any precedence for future actions with significant effects and does not represent a decision in principle about future considerations."*

Obviously, the associative impacts offered through the implementation of Alternative 2 does not comply with this statement since permanent, significant and irreversible impacts will result to some of the wild horse population that will always effect them on the NWHR and *all* future management actions.

Despite this, BLM fails completely to discuss the future impacts of this Alternative with the public under the heading of Decisions to Be Made. BLM compounds this deception by further asserting on Table 1, under Genetic Diversity, that No Impact To Genetic Diversity Is Expected Under Any Alternative.

It is only later, in the back of the document that BLM admits that Alternative 2 reduces genetic interchange through the removal of 75 wild horses from the breeding population and effectively results in the management of a viable wild horse population whose AML is only 225-425 through its implementation.

Does this failure to include an examination of Alternative 2 in the Decisions to Be Made at the front of the document support the position that no alternative is being offered besides the Proposed Action or does it indicate that BLM is deliberately posting vital information necessary for full consideration "in the back", hoping that no one will notice the projected impacts on the only "other" alternative presented?

Furthermore, the No Action Alternative would have the greatest positive impact to genetic diversity and viability through greater contributing populations levels. BLM also failed to include this most obvious impact in their analysis.

BLM needs to include an analysis of each of these impacts that is as easily accessible for public viewing as their Proposed Action as well as remedying their deceptive assertions that "No Impact To Genetic Diversity Is Expected Under Any Alternative."

ALTERNATIVE MANAGEMENT PROPOSALS

No Fertility Control

Include an alternative that does not involve the use of fertility control injections or stallion castration. AMLs were established without the need for fertility control measures.

Lure Trap

Water hauling is already being implemented at several locations around the NWHR. Lure trapping would be easy as the wild horses are both dependent on these sources and familiar with human activities around these areas.

Humane treatment of club-footed foals and wild horses would be accomplished through this capture method.

Use the savings from not hiring the helicopter crews and only removing 50% of the population to fix water developments instead so that they are again fully functional as well as applying for water rights on the NWHR like BLM said they would, including the 9 livestock wells currently in non-use that will never be used again for livestock purposes on the military installation.

Under this alternative, wild horse populations would still be reduced to ease competition and resource pressure, numbers would be very close to the newly established “high” AML but well under all prior AMLs that once were considered as maintaining the “thriving ecological balance” in the NWHR, still fall within water flow rate requirement of under 50% utilization levels to protect other species and resources but would now allow BLM funding to provide long-term solutions for proper wild horse management in the NWHR.

This will also save the National Program the cost of processing and containing an additional 400 wild horses for a year resulting in sufficient savings to fund additional wild horse removals in December 2008.

Proposed Action

Implement the Proposed Action, remove 800-820 wild horses, treat the returning mares with fertility control injections that don’t impact reproduction rates, fail to implement prior management plans including mitigating water loss and range improvements, fail to consider any other alternatives, continue to redraw management boundaries until all critical resource components are removed, approve of additional fencing projects that continue to remove water sources from wild horse use, continue to not monitor or report on monitoring results but continue to offer vague, authoritative assurances that reported resource use is transpiring, further reduce AMLs on monitoring information that is never collected or reported, hide big game species populations, reintroductions and management plans, fail to address direct and cumulative impacts done to wild horse and burro populations nationally, continue to ignore public protests, issue the decision under the authority of Full Force and Effect so that no accountability is required to remove wild populations, drive club-footed foals and wild horses for miles by helicopter, pay a contractor tons of money that has a long history of lack of compliance to SOPs or humane treatment of animals removed, continue to clog the adoption pipeline already glutted with the 70,000 removals, continue to request bids for more long-term holding centers, and continue to ship geldings through New Mexico into Mexico under the “Non-Slaughter Listing” of livestock exports, where they are no longer protected and can be properly “disposed” of.