

Bureau of Land Management
Las Vegas Field Office
4701 No. Torrey Pines Drive
Las Vegas, NV 89130-2301

August 13, 2007

RE: Nevada Wild Horse Range
Scoping Notice of Wild Horse Removals
#4700 (NV52)

Please continue to include me in the interested party list and to notify me of all proposals and actions regarding the Bureau of Land Management's activities and oversight of the Nevada Wild Horse Range, including but not limited to, land use plans and amendments, rangeland health evaluations, appropriate management level evaluations and determinations, fencing proposals, water developments and/or repairs, population census results, fertility control monitoring and results, status as to the toxicology reports, investigations and actions regarding the recent deaths of wild horses in the Nevada Wild Horse Range, all wildlife management actions and proposals, and any other proposal, assessment or study that effects the preservation and protection of the wild horses within the Nevada Wild Horse Range.

Since I have been informed by Susie Stokke, Nevada Wild Horse and Burro Lead, that my prior questions as to the reported population of the wild horses within the Wild Horse Range are inconsistent with the use of fertility control and will be addressed during the preliminary environmental assessment, I will not address them further for now.

On July 24, an email was sent to Ms. Stokke and Patrick Putnam, Assistant Renewable Resource Manager for the Las Vegas Field Office requesting the Rangeland Health Analysis and the environmental assessment that determined the new Appropriate Management Level decision issued in 2004 for the wild horse population in the Nevada Wild Horse Range.

On July 31, 2007, an additional email request was sent to Mr. Putnam for access to these documents. No response or reply was received during this scoping period.

Having had prior experience with BLM Las Vegas Field Office wild horse management, obtaining necessary documents for proper evaluation of proposals tends to be delayed, obstructed, or public access refused in a timely manner. It would appear this trend is continuing.

The BLM is only allowed to remove wild horses if they have been determined “excessive” by a variety of legal standards, policies and regulations.

Evaluations of prior documents and proposals in other HMAs being administered by the Las Vegas BLM revealed that AML decisions were not based on sufficient monitoring of rangeland resources, incomplete and inaccurate data, willful substitutions of pertinent data, improper calculations of utilization levels, and direct defiance of laws and agreements.

For example, in 2006/2007, I had requested either a summary of or a copy of the Memorandum of Understanding (MOU) between BLM Las Vegas Field Office and the National Park Service (NPS) in the Lake Mead National Recreation Area and the HMAs proposed for wild burro removals. The Las Vegas Field Office refused to provide either the summary or the documents during the assessment process (spanning several months) and cited on public record that it was an internal matter not available for public review.

Long after the burros had been removed, access was finally allowed and the MOU revealed that BLM had negotiated arrangements with NPS in April 2005 to determine wild burro population AMLs would be based on available forage while NPS would allow incidental use to access Lake Mead water.

However, in December 2005, BLM issued new AML determinations for the Muddy Mountain HMA based, not on available forage, but on lack of water and zeroed out the entire HMA for wild burro use through completely contrary conditions to the agreements they had just negotiated with NPS months previously.

By the time BLM released the documents to the public, all chance of appealing BLMs decision was gone as well as all the wild burros from the HMA being permanently removed and their native range of over thirty years out permanently eliminated for future generations.

The Nevada Wild Horse Range has seen the addition of over 600,000 acres to the HMA while appropriate management levels have been slashed by over 50%.

Prior records indicate that 5,000 to 6,000 wild horses once occupied the Range, even before the addition of the 600,000 acres. Those records indicate that this population level was truly excessive and placed both the wild horses and rangeland health in jeopardy but it does provide an indication as to the capacity of the Range for wild populations in balance with other uses.

Those prior records have BLM officials stating that 1,000 wild horses within the old HMA boundaries and acreage was a complimentary and balanced number. The AML of 1,000 wild horses was established prior to the new decisions issued in 2004 that cut that number by more than half.

The current population, especially when one factors in the recent removals of the 178 wild horses between July 6-8, 2007 and the 71 now listed as dead within the range, and the use of fertility control on released mares after the 2004 gathers, all indicate that the wild horse population is under the old AML of 1,000 that had been determined to be in thriving ecological balance within the HMA boundaries and is not excessive at this time.

This evidence, as well as prior “shenanigans” with BLM management decisions indicates that an evaluation of the documents used to determine this new AML are necessary in order to insure that the BLM Las Vegas Field Office is complying with federal laws, mandates, policies and necessary considerations for wild horse management and actions within the Nevada Wild Horse Range.

It is therefore “officially requested” that access be given in a timely manner to the documents I have already requested twice, the Rangeland Health Assessment and the assessment that determined the new AMLs for the Nevada Wild Horse Range.

Also requested is the final environmental assessment and Record of Decision/Finding of No Significant Impact that was issued authorizing the removals of the wild horses within the Nevada Wild Horse Range in 2004.

I deeply appreciate the opportunity to participate in the stewardship of our Nations irreplaceable resources.

Sincerely,

Cindy MacDonald