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Bob Abbey, Nevada State Director
Bureau of Land Management
1340 Financial Blvd.
Reno, NV 89502

Dear Mr. Abbey:

As the two Directors of State agencies with direct responsibility, for the preservation and protection of wildlife and wild horses in Nevada, we are seriously concerned with the outcome of the Decision Record (DR) on the Appropriate Management Level (AML) for the Red Rock Herd Management area. We have had many years involvement with not only the Las Vegas District but with wild horse management throughout this State. Our mandate by law is to ensure that responsible decisions are made that are in the best interest of wildlife, water resources, healthy rangelands, wild horses and citizens of Nevada. Our primary focus is for sound, scientifically credible resource decisions that include wildlife and wild horse management in a multiple use framework. The intent and direction of the Wild Horse and Burro Act ordered the Secretary of Interior to "manage wild free-roaming horses and burros in a manner that is designed to achieve and maintain a thriving natural ecological balance on public lands". In light of the documented resource damage from wild horse use, including riparian habitat degradation and the continued degradation of upland habitats all so important to native desert wildlife species, we question how this recent DR supports a thriving natural ecological balance.

The BLM's own National Wild Horse 81st Burro Advisory Board has also taken a position on ephemeral range conditions and Herd Management Areas (HMA). They have directed BLM to "identify ephemeral ranges and evaluate if management of wild horse and burro herds in those areas is justified and in the best interest of the herds." The decision for artificial management of the Red Rock Herd is in direct opposition to those recommendations. The findings and recommendations of the Red Rock HMA Range Assessment Team report was delivered to the Las Vegas Field Office Manager in December of 2003 and documents the degraded habitat conditions. These degraded habitat conditions are corroborated by field observations of NDOW biologists. Specifically, the team's recommendations were to remove all horses, as inadequate forage and water were available to sustain the herd, that the vegetative resources had already been severely damaged, and that the existing horses were only being maintained by the hauling of water.

While this herd area was designated as a HMA in the Las Vegas Field Office land use plan, the appropriate management level was to be determined by use of rangeland monitoring data. It appears that the data collected by the Range Assessment Team was not incorporated into the multi-tiered analysis. All real and significantly new meaningful data must be used and

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assessed to determine proper numbers to achieve and maintain proper functioning rangelands. According to the multi-tiered analysis, the herd management area was to be assessed to determine if there was an adequate quantity, of forage, water and cover to support a wild horse herd in addition to the existing burro population and in a thriving natural ecological balance with wildlife of the area. Second, the wild horse actual use of the existing forage was to be assessed on meeting the allowable use levels of key perennial forage species and meeting standards. Third, the determination of an appropriate management level must meet the scientific minimum genetic threshold to support an isolated and unique wild horse and burro herd. These tests must all be met to support a "thriving natural ecological balance", as is mandated by the Wild Free Roaming Horses and Burros Act of 1971 (Act).

Documented studies within BLM and scientific evidence justifies the need for a minimum of at least 50 breeding animals to support a natural gene pool and provide for provisions of the Act that require management of each herd for its uniqueness. The minimum of 50 breeding animals does not include foals and older non-breeding animals. Data shown by BLM establishes a herd size or AML of at least 75 horses as minimum for a viable gene pool. That would include the breeding population, foals and older non-breeding animals. Accordingly, the Red Rock HMA would need to support at least 75 horses to maintain a viable gene pool and retain herd character uniqueness. Yet, conflicting BLM reports indicate that the area only has adequate vegetation and natural water to support anywhere from 0 to 27 horses. It remains unclear to us why this DR has established an AML of 16 to 27 horses when this number of animals is inadequate to meet minimum genetic viability requirements and herd uniqueness, and some BLM studies demonstrate inadequate forage and natural water to sustain any horses.

We have significant concerns that the recent Red Rock DR sets a new precedent that the BLM intends to manage horses in a zoo-like setting outside of the requirements of the Act. It is our sincere hope that you will respond to our concerns on this specific decision and that we may initiate a dialog concerning its long-term implications. Thank you for your consideration of this matter.

Sincerely,



Allen Biaggi, Director
Department of Conservation and Natural Resources



Trawforth, Director
Department of Wildlife

cc: Steve Robinson, Governor's Office
Nevada Board of Wildlife Commissioners
Nevada Wild Horse Commissioners
Cathy Barcomb, Administrator, Nevada Wild Horse Commission