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Director Robert Abbey
Bureau of Land Management
U.S. Department of the Interior
1849 C Street NW, Room 5665
Washington, DC 20240

Re: Comments on the February 28, 2011 Proposed Strategy for Future Management of Wild Horses and Burros

Dear Director Abbey:

For the past few years, the Nevada Department of Wildlife (NDOW) has been very supportive of the efforts taken by the Bureau of Land Management (BLM) in their management of wild horses and burros on Public Lands. NDOW has submitted letters, provided testimony in the public forum and stood up in meetings providing praise and support for the program. We were encouraged by the steps being taken to reach Appropriate Management Levels (AML) of wild horse and burro numbers through gathers and removal of excess animals, however, we believe there is more that can be done by the BLM to ensure a thriving ecological balance.


It is NDOW's opinion that the currently proposed set of strategies is a significant change in direction that will severely impede BLM's ability to move towards AML in Nevada. The reduction in the planned removal of excess horses and burros through gathers will exacerbate the deteriorating range conditions and further stress wildlife populations where those species currently coexist. Expansion of horse use areas and establishment of horse sanctuaries on private or public lands will introduce new competition for forage and water with wildlife currently occupying those areas and is only expected to be a detriment to rangelands. NDOW would be more encouraged if we thought that wild horses could be managed as livestock and their herds more evenly distributed across the landscape. But this is not the case. Because of their nature, wild horses cannot be adequately managed in the areas they currently utilize. They tend to concentrate their use around water and trample the ground and vegetation until those water sources are no longer viable. Moreover, they prevent wildlife from using the water that is available, while removing nesting and thermal cover in areas that they frequent. Removal of the vegetation has provided an opportunity for invasive weeds to become established and spread to adjacent areas. At a time when BLM data indicates that a majority of the 85 Horse Management Areas in Nevada are currently over AML, the proposed strategy seems incongruent and very unwise.

The proposed strategy mentions many measures which we assumed were always a part of the program, but have been presented in this strategy as something new. These measures include the use of monitoring to justify adjustments in AML, use of immuno-contraception and sex ratio adjustments to slow herd growth, adoption and gathers to remove excess horses. If these measures have been at BLM's disposal and have been utilized, they have not been very effective since BLM data indicates that, in total, Nevada herds are still 8,000 – 10,000 animals over AML. It's hard for NDOW to understand how a 25% reduction in horse gathers will result in reducing the herd numbers closer to AML. The BLM has a responsibility under their Resource Management Plans to operate within AML. History has shown us that the BLM has been very restrictive in assuring that other land uses adhere to the terms of established management plans. It is of great concern to us that wild horse management has been allowed to operate outside of those standard guidelines.

NDOW continues to be supportive of those measures identified in the strategy that slow herd growth and remove excess horses from rangelands. We would encourage the use of immediate solutions to bring horse numbers under current AML. We oppose any measures that delay your ability to attain AML or actions such as increases in AML or opening new areas to wild horse and burro use. BLM is required under the Wild Horse and Burro Act of 1971 to manage wild horse and burros "in a manner that is designed to achieve and maintain a thriving natural ecological balance on the public lands". Range degradation has been documented and can be tied directly to wild horse and burro use. In fact, recent studies have shown that wild horses can have negative effects on Greater sage-grouse. The current program has failed to maintain this balance and NDOW feels that some of the measures proposed in this strategy will result in further degradation to rangelands and result in increasing impacts to wildlife.

The Department of Wildlife is always available to discuss our concerns regarding your agency's management of the Wild Horse and Burro Management Program with you and can suggest ways in which your program could be adjusted to have it address our wildlife concerns.

Sincerely,



Kenneth E. Mayer
Acting Director

Cc: Amy Lueders, Acting BLM Nevada State Director

SS:KEM:jw