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John W. Turner, Jr., Ph.D.  
Associate Professor

Cathy Barcomb  
Executive Director  
State of Nevada  
Subcommission for the Preservation of Wild Horses  
Stewart Facility  
Capitol Complex  
Carson City, Nevada 89710

Dear Cathy:

I am writing to protest the proposed Multiple Use Decision for the Basalt Allotment on the Carson City District. As director of an 8-year continuing research project involving the Montgomery Pass Wild Horse Herd I consider myself an interested and affected party in this decision.

Our research is a long-term population study of one of the few feral horse herds in North America which has not experienced removals in the past twelve years. The reason for this is ongoing predation on horse foals by mountain lions, with a resultant natural balance of the horse population. This situation has permitted the study of the dynamics of a feral horse population that is not manipulated by man. It offers a valuable reference point for the BLM to work from as the BLM attempts to satisfy its responsibility to manage feral horses "in a thriving, natural ecological balance" (quoted from the Wild Free-Roaming Horse and Burro Act, 1971).

The problem with arbitrary relocation of the boundaries of the Montgomery Pass Wild Horse Territory is that 10-15% of the herd, animals which are an integral part of this research program, may face removal. Although these horses use part of the Basalt Allotment in the winter, many of them use the higher elevations (summer range) in summer, thus interacting with other horses there. Any BLM action taken on Basalt horses will potentially disturb the dynamics of the entire herd. Considering the importance of the database we are developing in the Montgomery Pass Herd, I believe that any benefits to the Basalt Allotment are far outweighed by the potentially disastrous consequences to the herd database.

The decision for present management policy in the Montgomery Pass Herd was agreed upon by all participating agencies, including BLM. The Coordinated Resource Management Plan (CRMP) acknowledges the unique and valuable nature of the Montgomery Pass Herd. The population of the Montgomery Pass Herd is not increasing, and no downward trend in forage has been established. The CRMP position is to reevaluate management options if these circumstances change due to natural process. Arbitrary reassignment of herd area boundaries, whether legal or not, is unwise. It puts the future of "natural balance" in jeopardy by removing an integral part of the herd from protection.

As a research biologist who is interested in a better understanding of feral horses and as Chairman of the Wild Horse Subcommittee of the Montgomery Pass Wild Horse Territory who wants a healthy future for this resource, I protest the Proposed Action for the Basalt Allotment. In this case we must look beyond "local" management and pay attention to the larger scale of long-term feral horse management benefits across North America derived from keeping this herd intact.

Sincerely,

John W. Turner, Jr., Ph.D.  
Associate Professor  
Department of Physiology and Biophysics

JWT:mm