

Nellis

2-19-08

JIM GIBBONS
Governor

STATE OF NEVADA

CATHERINE BARCOMB
Administrator



DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES
COMMISSION FOR THE
PRESERVATION OF WILD HORSES

885 Eastlake Boulevard
Carson City, Nevada 89704
Phone (775) 849-3625 • Fax (775) 849-2391
E-mail: mustangs@wildhorse.nv.gov
Website: www.wildhorse.nv.gov
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Ron Wenker, State Director
Bureau of Land Management
Nevada State Office
1340 Financial Blvd
Reno, NV

Dear Mr. Wenker,

The Nevada Wild Horse Commission appreciates the opportunity to work with the Bureau of Land Management (BLM) in Nevada for the management of wild horses in our state. In a recent document regarding a proposed gather on the Nellis range, one of the management options proposed was to geld stallions.

In checking around, we were unable to find any policy or procedures that have ever been proposed or developed by the BLM in regards to any such a major action. There has never been discussion of potential impacts to the horses. We can't find that the BLM has evaluated the impact of gelding stallions, potential medical impacts to the animals themselves, impacts to management, or evaluated the benefit (or not) of doing such an action. A question should be: is this financially, medically, or for management considerations even feasible to consider.

All of these issues must be fully evaluated prior to inclusion in a gather plan. If, through evaluation, the BLM determines this is a feasible option, policy and procedures must be developed and accepted well in advance of implementation.

I brought this issue up as a concern at the National Wild Horse and Burro Advisory Board Meeting in Portland, fall 2007. They were also unaware of BLM proposing such an action. They offered to work with the BLM to help develop policy and procedures if this management action was determined to be considered.

Questions were raised at our Commission meeting on January 11, 2008, and discussed. The Commission did not take any action or make any determinations to either support or

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not, gelding stallions on public lands. We will reserve our judgment on such an action after BLM evaluates the feasibility of such a proposal, and develops policy and procedures for public review.

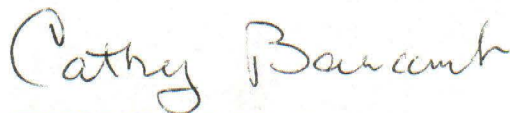
Just as an example, there have been arguments presented that stallions would be gelded that have "deformities" that should not be passed on in breeding. It was noted that these horses could then live out their lives as a wild horse versus coming in to corrals or a sanctuary to live out its life. What is the definition of deformities and what are the parameters. In policy, "deformities" should be explicitly defined.

Below, is a list of our concerns or potential issues to consider while evaluating such a major action as gelding stallions. As the Nevada Wild Horse Commission we would readily offer to work with the BLM to help evaluate this new proposed management action. As you may know, Dr. Michael Kirk, our Chairman is a long standing and respected Nevada equine veterinarian.

Initially, we would recommend that this be presented as a study and data thoroughly evaluated prior to wholesale implementation. You may be aware, but wanted to insure you knew of the release of stray horses in the Virginia Range. A recent action by the Department of Agriculture resulted in approximately 80-100 stray (wild) horses being released back on the range. These horses had been removed from the range, stallions were gelded and mares have had foals but not been exposed to the stallions for re-breeding. They have been treated with fertility control prior to release. This might be an excellent opportunity for the State and BLM to evaluate the impacts of geldings in a wild free roaming situation. Herd dynamics, interactions, etc, could all be observed and noted and used in determining BLM's proposed future actions.

If you have any questions please feel free to contact me. We look forward, as a Commission, to working with the BLM in Nevada to enhance the management of our wild horse herds and the habitat they need to survive.

Sincerely,



CATHERINE BARCOMB
Administrator

cc: Wild Horse Commissioners
National Wild Horse and Burro Advisory Board
Susie Stokke, Nevada Wild Horse Lead

**WILD HORSES
GELDING OF STALLIONS ON PUBLIC LANDS**

**BLM HAS NO POLICY AND PROCEDURES
BUT HAS PUT GELDING IN THEIR GATHER PLANS AS AN OPTION**

CONCERNS/ISSUES:

Temperature/time of year

Anesthesia yes/no

Who will be performing and how?

Transporting to PVC or other main facility vs field operations

Field operation policy

How long will they be held post surgery

Shots to prevent infection?

PROTOCOL:

Which horses will be targeted?

Age

Color

Conformation

Who will be making the decisions and those decisions need to be based on policy?

Define deformities

STUDY

Parameters of doing this as an initial study

What are you looking for in the study (bands, aggression, recovery time, etc)

The need to set up criteria to study and look for.

WHERE are you going to do the initial study area(s)? Should be in locations that are easily monitored for results. Good volunteer base. (Certainly NOT NELLIS)

Set up dates, times for monitoring and document results, distributing reports and to "who"?

Should be on healthy herds and animals, not failing populations that would skew results

ANALYSIS

What is the Cost Benefit to doing such an action?

What is the expected Herd/Recruitment/Fertility Control benefit to such an action?