ANIMAL PROTECTION INSTITUTE

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NEVADA WILD HORSE/BURRO NUMBERS

Dear Tom:

This is to confirm our telephone conversation of October 21 and request more information on the total number of living horses, the number and location of deaths, and the foal count as of September 30. You said on the telephone that your summer census counts show the population of adult horses (but not burros) in Nevada is 30 percent less than your winter/spring counts (e,g., your winter/spring counts are 70 percent higher than the summer counts).

This information is extremely alarming to us. We expect the normal annual mortality to be less than 10 percent of a given population; usually referred to as a 90 percent survival rate. We need to know the total number in order to understand 30 percent of what. Percents make no sense to us unless we know the whole number.

In addition to this, you say that foal survival is 6-8 percent. Does that mean a 92 to 94 percent death rate? We need to know the areas, when was the last capture operation, and if selective removal was employed. We need to have this confirmed in writing and would also appreciate your answering the following questions.

1. Are we correct in quoting you as saying there will be 8,000 to 9,000 less adult horses than anticipated due to die off that occurred between the winter/spring and summer counts? What are the dates of those two counts? What are the die off numbers for antelope and mule deer in these same areas in the same time frame?

QUESTIONS, cont.

- 2. Are we correct in our understanding that you have corrected your 1993 fall/winter roundup schedule in response to your finding that there are 8,000-9,000 less horses than you anticipated?
- 3. We see by your roundup schedule that you still intend to remove 2,618 this Fall and Winter rather than the original 4,038. What is the reason for that adjustment?
- 4. Can we quote you as saying at the time of our phone call that you did not yet have the information in from the field in order to tell us where the die offs are occurring?
- 5. Since the adjusted numbers, being left out of the scheduled removal add up to 1,365 (i.e, 4,083 minus 2,618) which HMAs are these 1,365 horses in?
- 6. In our telephone conversation you referred to the Elko District, citing the Maverick-Medicine HMA and Cherry Creek HMA, as areas where many aborted fetus were spotted in the snow, was that observation made during the winter/spring counts?
- 7. Was anything done with regard to safeguarding winter habitat during critical growth for this coming winter in Maveick-Medicine and Cherry Creek HMAs where many fetus were spotted in the snow last year? Did you investigate that report further to discern if this was a high abortion rate and the reason for the abortions?
- 8. Were you alarmed at the report of abortions found in the snow? If so, what action did you take in response?
- 8. We see that the projected removal of 475 adult horses from Maverick/Medicine has been deleted from the removal schedule. What was the rationale for not removing them? What was the original argument for removing them?
- 9. Did you say the Nellis area also showed a very low foal count with 700 adults to only 20 foals? What is the total count for the Nellis HMA?
- 10. We see that 1,000 horses are being taken off and 1,000 being left. How many of these are coming from inside the old Nevada Wild Horse Range? How many from outside? When was the last removal of horses from the Nellis area (inside and outside)? How many were removed (inside and outside) at that time? Was it a selective removal in which more horses were captured than actually removed? If so, what was the age structure of those released back?

- 11. In reviewing BLM's explanation of your selective removal policy (Page 36, November 4, 1992 Paiute Meadows Allotment Plan, which is Black Rock East).
- (A) It says that your population model uses age specific survival and fecundity rates and that foal production is CALCU-LATED by multiplying the number of females in each age class by the appropriate fecundity parameter, summing the total, rounding out, and then dividing equally into male and female. A random mortality generator in the 4-9 age class is suppose to simulate mortality. WERE POPULATION MODELS USED IN THE AREAS WHERE DEATHS ARE HIGH, WAS THE RANDOM GENERATOR APPLIED?
- (B) It also says that only one gather of the 0-5 age is assumed. "IF A SECOND GATHER OF THE SAME AGE CLASSES IS DONE, IT WILL RESULT IN THE VIRTUAL EXTINCTION OF THE POPULATION BECAUSE THE MOST FECUND AGE CLASSES HAVE BEEN REMOVED."

It also says that the population, in the sample scenario, is not totally wiped out due to the abnormally large percent of older animals, which--DESPITE LOW FECUNDITY, will produce enough foals to maintain the population, ALBEIT AT A VERY LOW LEVEL. It says that wild horses at these levels for a long time are MORE SUSCEPTIBLE TO CATASTROPHIC EVENTS SUCH AS ACCIDENTS, DISEASE, AND DROUGHTS WHICH CAN SERIOUSLY DECIMATE, IF NOT TOTALLY, EXTINGUISH THE POPULATION.

In view of the above information, did you expect a low foal population in Nellis and/or other areas where selective removal was used? What is the basis for removing 1,000 horses? I don't have a record of this 1993 decision.

- 12. In the telephone conversation you said certain Winnemucca areas, such as Calico, Warm Springs, Black Rock, and the Selenite Mountains, show a lack of winter forage even though it was a high precipitation year and forage production is up. In the information packet given to the fertility control task force entitled "Use and Abuse of Population Modeling," Berger reported a 10 percent mortality rate and of these 43 percent occurred at high elevations during winter storms. (His studies were on the Granite Range which lies between the Selenites and Calico Mountains.) Are livestock turned out and taken off in relation to the above information from Berger's studies? Did his studies affect how BLM manages livestock in order to protect habitat in upland meadows which Berger identifies as winter range?
- 13. Do you intend to apply selective removal procedures in the removals from these Winnemucca areas listed above?
- 14. In your opinion as the wild horse program leader is the 30 percent population decline the result of your selective removal policy? Is it the result of miscalculating (that is over-esti-

mating) or erroneous winter/spring counts? Are there 8,000-9,000 dead adult horses out on the ranges of Nevada or do they exist on paper only?

As you know, API's objective has been consistent and persistent in our attempt to obtain the protection of the optimum number for current conditions (by current we mean the average of your five year monitoring program) in those areas identified as wild horse and burro home ranges when the law was passed. We agreed with BLM's arguments for thriving natural ecological balance as the benchtest on removals. We also agree that determining the extent to which wild horses contribute to overgrazing (under sustained yield principles) in an ongoing management program of systematic monitoring and inventorying is required. We do not view removing horses as rescuing them but as BLM's failure to impose your own regulations (4710.5 and 4110.3-2) to protect yearlong habitat for wild horses and other wildlife. We hope we are not looking at the stage being set for emergency removals this winter.

We appreciate your taking the time to answer the above questions and thank you for the attention you give for a sound protection program. We need our answers before November 15.

FOR THE ANIMAL PROTECTION INSTITUTE

Nancy Whitaker

Director, Public Land Issues