



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

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May 29, 2008

Patrick Putnam, Assistant Field Manager
Bureau of Land Management
Las Vegas Field Office
4701 North Torrey Pines Drive
Las Vegas, Nevada 89130-2301

Subject: Nevada Wild Horse Range Herd Management Area Plan EA

Dear Mr. Putnam:

The Commission for the Preservation of Wild Horses appreciates the opportunity to review and comment on the preliminary environmental assessment for the Nellis Range. Wild horses within the Air Force holdings of the Nellis Range have been subject to the extreme environmental conditions of the Mojave Desert. It has been our observation that populations witness the bust and boom cycles dependent on precipitation patterns over time which presents extreme management challenges consistent with ephemeral ranges.

As a management plan, the text or appendix should include the factors and computations of the determined appropriate management level. This number should be portrayed as dynamic and dependent of habitat monitoring studies necessary to protect forage and water sources.

Over the past 20 years, the scheduled and emergency gathers should have provided the Bureau significant composition and genetic data to prescribe the future herd dynamics and objectives. Existing herd composition, age structure, sex ratios and genetics may be a result of random gathers and natural factors which may or may not have resulted in a natural and thriving herd.

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Herd area suitability can be an element of a Resource Management Plan or an element of this herd plan. As disclosed in the draft, a major portion of the delineated herd area does not have permanent water sources. In fact, the data suggests that about a third of the present herd area supports water, forage and cover suitable for the herd. This matter needs better definition in the document and justification to support the appropriate management level.

Social behavior of wild horse bands may be significantly altered with management actions that increase male ratios to mares or geldings by future gathers. While population controls are needed to reduce costs, the actions proposed will create may unknown impacts to the welfare of the herd.

As you are aware, at the recent meeting of the Nevada Wild Horse Commission, the Commissioners voted against gelding of stallions and returning them to the HMA on Nellis. This was discussed at multiple meetings and in general the Commission was still interested in the concept but there are so many unknown impacts that the Commissioners and this office would like to see this investigated much more intensely than just to implement on a range with the challenges that Nellis promises.

Initial gelding proposals should be implemented as "studies", to be monitored for impacts to the horses and their social structure. On February 19, 2008, the Commission sent a letter to Mr. Ron Wenker, Director, Nevada BLM, expressing our concerns for any gelding proposal in Nevada and asking that these concerns be investigated thoroughly prior to any suggestion of implemented actions in Nevada. We have still to receive an answer to that letter thoroughly assessing each of the concerns. If gelding of stallions to be introduced back to the HMA is considered in any HMA's, these issues should be thoroughly analyzed prior to any implementation. (see attached)

Also, since the late 80's, typically Nellis has been gathered in December of each year due to military activities. Prior to that, Nellis was always gathered using the water trapping method in the summer months. Isn't water trapping much less expensive and less stressful on the horses than helicopter gathers in December which also poses extreme weather challenges? Why was there a decision to change? We realize it is easier on the military in December but prior to this, they always accommodated summer gathers. Dr. Mike Kirk, our Chairman, had been asked by BLM for his professional opinion regarding the gelding project on Nellis. He was not asked his opinion as to "if" this action should take place, only his medical opinion. As you can see, in addition to his other comments that make this prohibitive, "the procedure is best performed in the spring or early summer prior to fly season." This would definitely negate doing this procedure in December of any year when Nellis is so brutally cold according to professional medical opinion. (see attached)

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Additionally, in the past years, the Commission has recommended that the BLM investigate the feasibility of making Nellis a non breeding population. We still wish to see that considered. With the unsure future of funding and sanctuary availability, the BLM should consider all options and possibly a "sanctuary" situation on Nellis. This could benefit the program by providing a place for non breeding mustangs to live out their lives as free roaming wild horses and at much lesser cost than the holding costs of current privately contracted sanctuaries. The horses could then be monitored for population size in concert with the habitat and additional animals placed there as attrition reduces the population numbers. This will also help to reduce conflicts with military operations as gathers would reduced if not eliminated altogether.

We encourage the Field Office to amend the present document to include necessary parameters and data to better define the future management of this herd. Given the extreme ephemeral nature of the range and population crashes that are now ongoing and observed in the past, the plan needs to fully address these matters.

Sincerely,



CATHERINE BARCOMB
Administrator



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February 19, 2008

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

Ron Wenker, Director

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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?



Michael D. Kirk DVM

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Ref: 4700(NV-930)

Susie Stokke
Wild Horse and Burro Program Lead
Bureau of Land Management
Nevada State Office
PO Box 12000
Reno, NV 89520-0006

PO Box 5896
Dear Susie,
Telephone: 775-

Thank you for asking for my professional opinion regarding the gelding project on the NWHR. Enclosed please find my comments.

Susie Stokke

- **Surgery should be performed by a Nevada Licensed equine veterinarian in good standing and of known ability.**
- **Anesthesia will exclude the use of succinylcholine chloride (ie) Sucostrin and keep within the welfare guidelines for the horses with regards to analgesia and adequate ventilation.**
- **Performing the surgery in the field with a 7-10 day observation period is probably the least traumatic and stressful on the horses. Conflicts and confrontations between post-surgical individuals may be kept to a minimum using a large holding facility.**

• **Depending on age, testosterone levels appear to be negligible by 30 days post-surgery.**

This may influence post-operative monitoring times.

- **Post-operative antibiotics is controversial with long acting penicillin being one drug of choice. This item could be discussed further.**
- **The procedure is best performed in the spring or early summer prior to fly season.**

Thank you for allowing me to comment. If I can be of further service please do not hesitate to contact me.

Sincerely,

Michael D. Kirk DVM

This man

Partners

advises

the

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