



**COMMISSION FOR THE
PRESERVATION OF WILD HORSES**

1105 Terminal Way
Suite 209

Reno, Nevada 89502
(702) 688-2626

July 10, 1997

Mr. Michael F. Dwyer
Las Vegas District
Bureau of Land Management
4765 Vegas Drive
Las Vegas, Nevada 89108

Subject: Emergency Removal - Nevada Wild Horse Range

Dear Mr. Dwyer:

The Commission for the Preservation of Wild Horse has received and reviewed the Full Force and Effect Decision for an emergency gather on the Nevada Wild Horse Range. This gather represents another major action taken to protect wild horses from a major die-off and long term damage to range conditions on Nellis Air Force Base. While it is understandable that an emergency gather is required to save individual horses, the present action appears to be programmatic to the Nevada Wild Horse Rang Herd Management Plan. The cumulative impacts to this herd has great significance to the science of wild horse management in Nevada.

NEVADA WILD HORSE RANGE HERD MANAGEMENT AREA GATHER PLAN

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The Nevada Wild Horse Range Herd Management Plan established the appropriate management level based upon observed utilization within a five mile radius of available waters. Drought conditions in 1995, 1996 and 1997 may best represent the range's ability to support wild horses. While the District choose 40 percent utilization as an allowable use level, a more conservative percentage could have been chosen for range recovery or proportional to the growing season. It is reasonable that the appropriate management level is 600 horses under present conditions.

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FINAL ENVIRONMENTAL ANALYSIS FOR NEVADA WILD HORSE RANGE AND HERD
MANAGEMENT AREA

It would be timely to amend the management plan with a more accurate appropriate management level. Given the present status of water developments, the present herd may need to be less than 1000 head. Since the herd has had continuous culling, the surviving herd composition is important. If a majority of horses are 18 years old and mares have had fertility treatments, a precious release criteria should be provided in the gather plan.

In summary, over ten thousand horses have been removed from Nellis over the past eleven years. Data collected from these gathers should provide create insight on longevity, productivity and survival of wild horses in southern Nevada. We encourage the District to summarize these data and provide the Wild Horse and Burro Program some guidelines for future policies.

Sincerely,



CATHERINE BARCOMB
Executive Director