

W. G. NELLIS
6-21-93

4700 (NPO-960)

Memorandum

To: David Williams
From: Bruce Dawson
Subject: Response to API Letter

The following is a response to the June 21, 1993, letter from the Animal Protection Institute of America (API) to Director Baca. The letter contains a long discussion of events which occurred during the 1991, Nellis Air Force Range wild horse emergency removal. Much of Ms. Whitaker's discussion surrounds her perception that BLM provided false statements to justify the removal and the conducted a public affairs attack on API through the media.

BLM worked very closely with a myriad of special interest groups in identifying that a problem existed on the Nellis Range, preparing a capture plan, conducting the removal effort, and providing care for the sick animals along with the orphaned foals. BLM worked closely with: Wild Horse Organized Assistance, Nevada Commission for the Preservation of Wild Horses, American Horse Protection Association, Humane Society of the United States, National Wild Horse Association and International Society for the Protection of Mustangs and Burros. Although API was repeatedly offered the opportunity to participate in tours of the site, they chose not to participate with BLM and the other special interest groups.

The Nellis removal, because of the degree of animal suffering, created a considerable amount of friction between those supportive of the removal and those opposed to it. API was the predominant group opposing the removal of animals from the Nellis Range. Much of API's allegations of false information and attacks on them came not from BLM but through the other groups. BLM public affairs played an insignificant role during the controversy with the media focusing on the special interest groups.

The Nellis Air Force Range became a controversy with the convergence of two factors: (1) A population in excess of resource capacities due to delays in gathering resulting from API challenges of the Nellis RMP and other previous removal operations; and (2) 1991 represented the sixth year of drought in central Nevada resulting in most of the springs within the Nellis Range drying-up. At the initiation of the Nellis removal in May 1991, there were approximately 7,000 wild horses and burros, water available to sustain only 1,000-1,200 animals and most of the herd management area was receiving heavy to severe utilization. The emergency was critical and monitoring supported an immediate response.

changing that API had appealed BLM's removal decision.

Response: BLM did not accuse API of appealing the Final Nellis Air Force Range Wild Horse Removal. BLM identified that API had commented on the proposed capture plan. Any discussions concerning an appeal originated from sources other than BLM.

Assertion #2. BLM falsely claimed that 2000 horses died.

Response: BLM never identified that 2,000 had died as a result of the Nellis emergency. The capture plan specifically identifies that there had been some death loss and that a considerable number of animals would die if no action were taken. Upon completion of the gather, BLM did determine that there were virtually no one and two year old wild horses within the population. A normal age distribution would have expected to find 1,400 to 1,600 animals in these age groups.

Assertion #3. BLM field data indicated that only 80 horses died.

Response: BLM Contracting Officer's Representative logs identified that during the 3 months of gather operation in the summer of 1991, 80 animals were either humanely destroyed or died (e.g., dehydration and injury).

Assertion #4. BLM falsely claimed 400 foals were abandon and starving.

Response: BLM removed approximately 400 foals during the Nellis Gather. Some of these foals were in fact in danger of dying or being abandoned by their mothers. Many of the foals were removed from their mothers in an effort to give both the mare and the foal a better chance of survival.

Assertion #5. The authority which BLM disposed of 400 foals remains a mystery.

Response: The orphaned wild horse foals were adopted to qualified applicants after an extensive screening process conducted by both the BLM and by local wild horse and burro advocacy groups. The screening included pre-adoption facility inspections and regular compliance check during the year. No fee was charged for the foal adoptions as prescribed under 43 CFR 4750.4-2(a).

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Assertion # 6. BLM falsely claimed there was an overpopulation of wild horses at Nellis.

Response: In the summer of 1991 a population of 7,000 wild horses and burros existed on the Nellis Air Force Range. Naturally occurring water sources were supplying the animals an average of 10,000 gallons of water per day. Standard equine requirements are that each wild horse needs 10 gallons per day. Thus, BLM set the appropriate management level at 1,000 animals. In addition, vegetative monitoring data indicated that the majority of the wild horse and burro range had been grazed at the heavy to severe level. The result was the virtual elimination of all indigenous wildlife species, including antelope and badger.

Assertion #7. BLM secretly eliminated 90% of the wild horse habitat in Nellis

Response: The Nellis RMP identified the herd area boundaries of the Nellis Air Force Range. This boundary is the same as that which was established during the mid-1960's when the range was first established.