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NDOW-SR#: 13-228
SAI#: E2013-220

Randy Swick, Area Manager
USFS - Spring Mountains NRA
4701 N. Torrey Pines Drive
Las Vegas, NV 89130-2301

Re: NOPA: Springs Mountains Wild Horse & Burro Complex Herd Management Area Plan (HMAP)

Dear Mr. Swick:

The Nevada Department of Wildlife (Department) has reviewed the materials describing the Notice of Proposed Action (NOPA) for the proposed HMAP. The Department supports the proposed HMAP, welcoming this approach for attaining the goal of thriving natural ecological balance on the greater Spring Mountains, the sky island of Clark and Nye counties. We also appreciate the candidness of the existing situation and administrative considerations; the ability to schedule past, meaningful gather-removals has often been determined by available funding and room at regional holding facilities.

No doubt preparation of the HMAP environmental assessment (EA) will now include analysis of the effects that the nearly 28,000-acre Carpenter 1 fire has had on the environment, both inside and outside of the Spring Mountain Herd Complex. As a consequence, the Department anticipates a new alternative emerging reflecting fire impacts and proactive measures facilitating landscape rehabilitation mindful of the effects to recreation values, natural resources conservation, and climate change. We are requesting participation in discussions to this end as the fire has also had obvious effects to wildlife habitats.

Regarding the short-term effects of the Carpenter 1 fire, the Department encourages the Forest Service and BLM in immediately performing an emergency gather and removal of wild horses and burros that remained in fire-affected areas or would attempt to repopulate these areas; this includes areas to which horses and burros have fled to evade the fire outside of the Spring Mountain Herd Complex. We suggest the removals would both be permanent and temporary until revised appropriate management levels are developed to account for AUM losses and until BAER and subsequent restoration efforts indicate vigor for sustaining releases of horses and burros at the lower end of the revised AML for each joint herd management area.

Thank you again for this opportunity to provide input. Please do not hesitate contacting me regarding this letter using the below information.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Bradford Hardenbrook".

D. Bradford Hardenbrook
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cc: Deb MacNeill, BLM-Pahrump FM
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