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First name: Carl

Last name: Mrozek

Organization:

Title:

Comments: Spring Mountain Complex: Public Comments

Sirs & Madams,

Please find my comments on your proposed roundup of possibly over 900 wild horses & burros in the Spring Mountain Complex in southern Nevada, attached.

Carl Mrozek

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Lancaster, NY 14086

Ms Terri Froli, Project Leader; Mr Randall G. Swick, Spring Mtn. NRA Area Mgr.; Ms Deb MacNeill, BLM

Pahrump Field Office Mgr.

4701 North Torrey Pines Drive

Las Vegas NV 89130-2301

Re: Spring Mountains Wild Horse & Burro Complex Herd Management Area Project Plan, Humboldt-Toiyabe Nat'l. Forest, Spring Mtns. NRA & Bureau of Land Management, So. Nevada District. USFS Project # 40960; BLM Project # DOI-BLM-NV-S030-2013-0010-EA

Dear Sirs & Madams,

The proposed plan to remove upwards of 900 wild horses & burros from the Spring Mountain complex in southern Nevada is far in excess of what is necessary to prevent overgrazing of public range in these areas. This high target number actually exceeds BLM's own low estimate of the entire remaining population in this vast 619,470 acre wildland complex. In other words, given the perverse incentive of BLM contractors to grab every possible horse or burro, this could result in the virtual extinction of wild horses and burros in southern Nevada, on all three delegally protected range areas.

And for what purpose is this decimation being proposed ? The answers are the same lame mantra: To prevent overpopulation and range degradation –without data to support these claims. The facts are that even given a possible current population of over 1100 horses and burros, according to BLM, there is little if any evidence of widespread overgrazing by wild equines, –merely concern over its potential. This begs the question: Is this a solution in search of a problem ? It would seem so.

Moreover, is this the most urgent and expedient way for BLM to spend nearly a million dollars when it can't afford to properly and humanely care for nearly 50,000 wild equines that it currently warehouses ? Over 60 wild horses have died mainly due to improper care at Palomino Valley Holding Center where no shade and too little water is provided, yet BLM has no qualms about spending over \$ 1 million to add nearly another thousand to that number ?

If BLM were at all committed to a science-based management of the wild horses & burros entrusted to their care, they would ensure that all 50,000 received the same standard of care as demanded of adopters, rather than compounding the problem by adding nearly another 1000 animals to the current obscene total of 50,000+.

By contrast, it costs BLM very little to leave them on the range where they are currently flourishing. All that is

needed in most cases is to enable and help volunteers to supplement natural water sources during the heat of the summer, and other excessively dry periods, in order for them to live free on public lands at minimal cost to taxpayers.

If BLM were truly interested in a long term solution it would endorse the management plan proposed by the Spring Mountain Alliance for these same wild horses and burros and actively foster wild horse & burro-centered ecotourism which would provide scores of local jobs and encourage local residents to monitor and help sustain local horse & burro herds to support the 'geese which lay the golden eggs'.

It would also support suggestions by the Spring Mountain Alliance for science-based management of these same wild horses and burros as urged by the NAS review panel in their detailed report released just over a month ago.

The question confronting BLM in the Spring Mountain Complex, as in the remaining 170 or so remaining HMAs is whether BLM will evolve and grow into a science based steward of all the resources entrusted to its care, or will instead continue to favor a small handful of special interests, over the public interest, as it has for much of the last 40 years that it was tasked by the US Congress with managing public lands and wild horses and burros in a balanced manner. Removing 80-90% of 5 healthy wild horse and burro herds in the Spring Mountains and 100% of another, is clearly not a balanced approach and is clearly not in the public interest. This begs the question: exactly who is the BLM trying to please with yet another broadside against America's wild horses and burros, which in this case are some of the most watched wild equines in the US ?

Respectfully,
Carl Mrozek, filmmaker

PS Please search for the many short TV features I've produced for the CBS Sunday Morning magazine show at cbsnews.com under the nature segment & under the Sunday Morning menu then searching: wild horses, & wild burros -Nevada.

Nearly half of these were shot in the Spring Mountain complex due to its comparatively easy access to my most frequent gateway –Las Vegas. Implementing your proposed plan to decimate the Spring Mountain herds will seriously impair my ability to continue doing so, especially on as regular a basis.

Thus depriving Nevada and the BLM of millions of dollars in free national advertising