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First name: Ruby

Last name: Jim

Organization:

Title:

Comments: Public Comment

Please see attached for comment by the Jim family. Thank you.

P.O. Box 1203

Pahrump, Nevada 89041

July 14, 2013

Randy Swick, Area Manager

Spring Mountains National Recreation Area

4701 North Torrey Pines Drive

Las Vegas, Nevada 89130-2301

Dear Mr. Swick:

This letter is intended to document comment by the Jim family in response to the proposed Spring Mountain Wild Horse & Burro Complex Herd Management Area Plan Project. This letter will attempt to address proposals by the National Forest Service (NFS) as documented in the Frequently Asked Questions (FAQ) handout given to attendees at the public meeting held in June in Pahrump, Nevada.

First, with regard to what is deemed Appropriate Management Levels in both Joint Management Areas and NFS lands, our family expresses concerns regarding the determination of what is considered "appropriate" levels. Due to the sensitive nature of the topic at hand, we feel it is necessary for independent evaluation of the areas in question to take place in addition to efforts by the collaborating agencies in order to determine what is actually "appropriate" for the area rather than simply taking the word of the involved agencies. In addition, lower limits of the Appropriate Management Levels should not support levels which would indicate endangerment or complete removal (extinction) of the herds from the land.

Second, based on general knowledge of the history behind herd management, our family wishes to make clear our opinion that it is inappropriate to allow grazing issues or recreation to dictate herd management. Though no mention is made of potential grazing rights in the documentation provided at the public meeting, this is historically a big point of contention in many areas of herd management. The horses were here first. Wildlife is very important to Native Americans such as the Jims, as are the rights and safekeeping of the natural environment. We do not believe in owning, controlling, and manipulating all possible environments for the benefit of people and profit.

Third, the FAQ handout referenced an analysis of "how excess wild horses and burros cause an increase in the frequency of nuisance encounters, as well as dangerous driving conditions." It appears the collaborating agencies have already determined that they do indeed cause an increase in the frequency of "nuisance encounters." However, our family advocates for, and would expect to see, documentation of documented incidence of these encounters over time; evidence of whether the frequency of these incidents is increasing, decreasing, or staying stable; and alternative methods to prevent or decrease the incidence of these "nuisance encounters" above and beyond simple roundup and removal of the animals.

Finally, the handouts received at the meeting did not indicate any alternate methods of population control were to

be considered. Rather, the FAQ document states “this analysis will analyze how initial gathers could begin...depending on availability of space...or funding limitations.” Our family, though hesitant to embrace herd management at all, would consider the necessity based on the needs of other components of the natural and original environment. We most assuredly do not support “gathers” and believe the animals should be allowed to live out their natural lives in their native environment. This being said, other methods of population control - such as those suggested in the report requested and submitted to the Bureau of Land Management (BLM) by the National Academy of Sciences (NAS) - must be considered as a more appropriate alternative to the current option as referenced in the FAQ document. In the pursuit of these alternate methods of population control, specific guidelines for the treatment of the animals and stringent consequences for violators, along with language to provide for independent monitors, need to be put into place before attempting their use. The safety and interests of the animals must come first and supersede convenience.

In closing, our family would like to remind the collaborating agencies of this report by the NAS. The FAQ document states the BLM intends to “remain committed to making ...improvements” and “will make a more detailed response to the...report in the future, after having the opportunity to review the report in greater depth.” At this point, then, it appears premature to develop and implement a Herd Management Area Plan that will encompass the next 10 or more years when complete evaluation and consideration of current, documented information specific to the topic, location, and one collaborating agency of the project have not yet been finished. It would also appear negligent on the part of the NFS if the agency did not also review and take into account the recommendations made by the NAS due to the relevance of the information to the proposed project. We encourage both agencies to review and consider the report by the NAS before moving forward with a long-term management plan, to consider the comments put forth in this letter, and to keep in mind that how humans treat the world they were given to protect ultimately determines the true measure of their humanity.

Sincerely,

Eddie Jim  
Clarabelle Jim  
Lorraine Jim  
Ruby Jim  
Eddie H. Jim  
Katherine Jim  
Jerome Jim  
Kim Jim

and on behalf of other Native Americans with whom we have spoken