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First name: Arlene
Last name: Gawne
Organization: Spring Mountain Alliance
Title:
Comments: 1. Goals of an Experimental Management Plan for Wild Horses/Burros in the Spring Mountains
The Spring Mountain Alliance (SMA) is a project of America's Wild Horse Advocates (AWHA),which is a volunteer non-profit 501(c)3 organization of over 1400 concerned citizens,professionals and businesses, 90% from Southern Nevada (Appendix 1).

SMA supports scientifically-sound management of a healthy range for recreation, wildlife and the last free-roaming bands of wild horses and burros in the in the Spring Mountains, west of Las Vegas. The Alliance's ultimate goal is to increase wild horse and burro viewing opportunities for future generations of horse and wildlife enthusiasts, photographers, American and foreign visitors.

In a limited portion of the Spring Mountain Complex - an Experimental Management Area - SMA volunteers propose to annually dart all mares (except those allowed to have one foal for genetic diversity) with the proven contraceptive vaccine PZP, (ZonaSat-H), to maintain a detailed wild horse/burro data base, and to conduct range improvement projects in partnership with the Bureau of Land Management (BLM) & U.S. Forest Service (USFS) to assist in their land management mission in a period of dwindling public agency resources. Successful examples of volunteer/agency partnerships are detailed in Appendix 2.

To reduce the detrimental high cost of helicopter roundups, long-distance transportation of, and long-term storage of wild horses and burros in holding facilities, the Alliance proposes to assist in selective removal of the most adoptable, easily trainable 2 to 4-year-old horses and burros. Removal would be by bait-capture of family .bands at taggered intervals so local adoption demand will not be overwhelmed. The Alliance would aggressively promote local adoption.

After treating all bait-captured mares and Jennies with PZP, intact family bands would be released back onto the range to retain social stability. Scientific observation has shown that stable family bands can prevent early pregnancy of young mares, 3-years of age and under. Older horses and burros would be returned to the range so their knowledge of local water and food sources ,is not lost in times of drought, fire or inhospitable conditions.

The relatively compact Experimental Management Area close to Las Vegas is an ideal area to conduct trials of innovative, scientific methods for improving population estimates and assessing range management practices in order to maintain genetically diverse, healthy populations and accurately estimate the productivity of the range as recommended in the National Academy of Sciences, National Research Council's 2013 report, Using Science to Improve the BLM Wild
Horse and Burro Program: a Way Forward (ISBN 978-0-309-26494-5).

Regular PZP application, staggered selective removals for optimum adoption opportunities, and co-operative range monitoring and improvement projects could save government agencies and the public millions of dollars over a 5-7 year period while limiting wild horse & burro population growth to acceptable levels.

2. Geographic Area of an Experimental Wild Horse Management Plan

SMA proposes to limit wild horse population growth and improve range conditions in that portion of the Spring Mountain Complex where volunteers have maintained a detailed data base on wild horses for over 3 years (see map on the title page of this document) ..This Experimental Management Area will encompass a portion of the Spring Mountains/ Wheeler Pass JMA (Joint Management Area) and the Johnnie JMA:
•west and south of Highway 95

•east of Highway 160 and the town of Pahrump,
•north of Lee Canyon (Highway 156) on the east side of the Spring Mountains,
•north of Wallace Canyon on the west side of the Spring Mountains.
The Experimental Management Area will exclude Lee and Kyle Canyons; Wallace Canyon and the area south of Wallace Canyon; Mt. Charleston and Mt. Stirling Wilderness Areas, and the Red Rock JMA.

3. Population Control with PZP Application by Remote Darting and/or Bait-Capture

The Spring Mountain Alliance proposes to control wild horse populations by annual darting of all mares (except those allowed to have one foal for genetic diversity) with the proven 1-year PZP, (ZonaSat-H) that has 95% efficacy. Since the population and movement of wild horses within the Experimental Management Area has been well documented by the Alliance and since 3 volunteer teams are already certified for remote darting, we expect to be able to treat 80% to 100% of mares within the first two years. Thus herd growth may be reduced to near zero within 5-6 years (Appendix 3).

The darting program would be modeled after the Assateague Island, Pryor Mountain Wild Horse Range, and Little Book Cliffs programs and follow standardized protocol. After the initial application of primer and booster doses in the first year, the annual booster darting could be staggered so that each mare would have one opportunity to add a foal to the gene pool.

In May 2013, three SMA volunteers with hunting backgrounds were trained and certified for PZP darting at the Science & Conservation Center, Billings Montana. Additional volunteers are ready for certification if needed. Each certified darter will have a volunteer assistant to photo-ID the darted mares and collect the spent dart according to strict protocol. Remote darting from ATV's (all-terrain vehicles), horseback and foot primarily near water sources has proven successful particularly with pneumatic guns that can shoot up to 50 yards with little recoil or sound. Bait- capture may be utilized in certain areas where mares cannot be accessed for remote darting.

Optimally, the primer doses would be administered in fall/winter 2013 and booster doses administered in spring 2014 before the breeding/foaling season. Because the long EA process may not be completed until spring 2014, SMA asks that USFS/BLM give early approval for a fall/winter 2013 application of the primer dose to all mares rather than have another wave of foals to be born in 2015.

Darting all mares with PZP primer in fall/winter 2013 will not hurt the mares in any way even if the final EA does not approve the Experimental Management Area Plan by 2014. In that case, the 2013 darting cost in time and PZP materials will be borne solely by SMA.

PZP application costs are estimated to be $17,000 in the first year (including initial training, certification and equipment) and declining to 25% of that cost by the third year. The Alliance asks USFS/BLM to pay the PZP training, dart guns & contraceptive materials which is a tiny fraction of BLM's current removal and long-term storage system. If USFS/BLM declines to absorb all or part of this application cost, private donors are prepared to fund the remote darting program.

The Alliance has not yet documented wild burros in the Experimental Management Area and PZP contraception of Jennies is a more complicated process. However, the Humane Society of the United States' Platero Project is considering local partnerships to research contraception and increase local adoption of burros now that their funding is in place (Appendix 4). The Spring Mountains may be an ideal area for such a research partnership because of the excellent habitat for burros and the already established volunteer base in Las Vegas/Pahrump.

4. Selective Removal of Adoptable Animals by Bait Capture at Staggered Intervals

Some wild horses/burros may need to be removed in 2014 and 2015 before repeated PZP contraception depresses the birth rate to very low or near zero within 5-7 years (the typical time period between helicopter roundups/mass removals). In the Experimental Management Area, the Alliance recommends that USFS/BLM selectively remove only highly adoptable young animals at staggered intervals instead of a single, large scale helicopter roundup and removal advanced in the June 2013 scoping report. SMA proposes that bait-capture methods be used to:
•Remove only the most adoptable young wild horses and burros between 2 to 4-years of age because they are easier to train and develop bonds with their human adopters. The SMA data base will be examined to determine how many wild horses fall in that age category, but possibly 30-35% of the estimated 150-200 horses in the Experimental Management Area are in this age group.
•Stagger the bait-capture of a smaller numbers of horses and burros over a 1to 2-year period to limit the number of animals released for adoption. Excess supply at one time vastly overwhelms the adoption demand, espeCially locally.
•A limited number of the 2 to 4-year-old age group should be returned to the Experimental Management Area, in particular, horses that have shown noteworthy leadership traits.

It is not necessary to roundup Spring Mountain wild horses and burros by helicopter. Wild horses in the Experimental Management Area are largely human-habituated due to the high usage of the range by off-road recreational vehicles, hikers and visitors. Their watering spots and movement patterns are well-known to SMA volunteers who have observed them intensively for 3-8 years. Given this local knowledge of their concentration points, it will be easy to lure them into temporary pens by placing mineral blocks or hay inside, particularly in winter and spring. In 2013, burros were easily rounded up by bait-capture in the Red Rock JMA.

There are multiple disadvantages to a large-scale helicopter roundup/removal namely:

•Extremely costly to taxpayers in a time of serious budget shortfalls,
•Excess breeding of remaining mares follows immediately when mature, dominant stallions and lead mares are removed after a large scale roundup. It can take up to 3 years to restore stable leadership of family bands,
•The National Academy of Sciences 2013 Investigation, Using Science to Improve the BLM Wild Horse & Burro Program: A Way Forward, found that “Decreased competition for forage through removals may instead allow population growth, which then drives the need to remove more animals.
•Running animals over long distances up to 10 miles in winter cold is physically stressful to the animals and is extremely disturbing to the public,
•A 2014 helicopter roundup may result in an estimated 400-700 Spring Mountain horses and burros of all ages being ‘dumped’ on the adoption ‘market’ all at once, guaranteeing that most animals will not be adopted. When supply outweighs demand, most horses and burros go to costly long-term holding, an unnecessary burden to taxpayers.

The Alliance would aggressively promote local adoption of the removed Spring Mountain horses and burros through their excellent contact base in local radio, television, and newspapers, website at http://springmountainalliance.org/, social networking of all kinds, equestrian newsletters and promotional materials at local riding events, libraries, schools, etc.

The Alliance can advise prospective owners and check bac on their progress in conjunction with local USFS/BLM staff. Already the Alliance has documented over 20 local area adoptions mostly from Red Rock Canyon 2002 – 2004 removals.

5. Ongoing Population Data Base and Range Monitoring Projects

SMA volunteers have been systematically identifying stallions, mares and foals in the Experimental Management Area for over 3 years. The data base is on Excel spread sheets and will be transferred to an approved

card/computer tablet system before PZP darting begins (Appendix 5).

Approximately 145 individual wild horses have been identified and a maximum of 200 wild horses are expected to be found in the Experimental Management Area. These horses have been recorded moving across the Wheeler Pass to forage on both the west and east sides of the Spring Mountains. A small number, usually less than 25, move in winter into the eastern side of the Johnnie JMA to utilize springs and forage at lower elevations below the snow line. Elsewhere in the Johnnie JMA, the habitat is suited only to burros.

The majority of the SMA-estimated 145-200 wild horses are concentrated on the east side of the Spring Mountains, particularly around the Cold Creek area, west of Highway 95, about 30 minutes from Las Vegas. In the winter they congregate at low elevations below the mountain slopes and the village of Cold Creek. In late spring and early summer, after their new foals strengthen, the family bands move into cooler, higher elevations to forage.

The Experimental Management Area an ideal place to test innovative population and range monitoring techniques due to its relatively small land mass, abundance of experienced volunteers, and its proximity to the University of Southern Nevada (UNLV).

Innovative monitoring techniques could include placing an identification microchip in each wild horse and burro at time of bait-capture, and experiment with state-of-the-art infrared cameras on mini-drones to track horse/burro movements across the range in conjunction with the U.S. Geological Survey (USGS), etc. BLM/USFS and SMA volunteers could work with UNLV and the Nevada Department of Wildlife (NDOW) to scientifically study inter-relationships between all wildlife including wild horses, burros, elk, deer and smaller mammals as they impact range health.

Scholarships could be created for doctoral students from the University of Nevada and other universities to conduct detailed behavioral analysis of free-roaming wild horses and burros and detailed range analysis of critical forage areas by methods such as tripling the current 10 paired-plot benchmark sites in the Experimental Management Area.

6. Range Improvement Projects

To maintain a healthy range as required by USFS/BLM, the Spring Mountain Alliance can organize volunteers to help with suitable range improvements within the Experimental Management Area such as:

•Building water guzzlers and seasonal water retention basins across the range to disperse the grazing impact of elk and wild horses away from perennial springs. This should be the first priority for range improvement. It can be done in conjunction with local elk and big horn sheep protection groups and the Springs Stewardship Institute, Museum of Northern Arizona, http://springstewardship.org/springmountains.html .
•Within the Experimental Management Area, volunteers can help construct fences to prevent wild horses and burros from entering ecologically sensitive areas like riparian habitat or the zone of the proposed endangered species, the Mt. Charleston butterfly;
•At low elevations in winter, spot-burn several small areas of 5 to 10 acres within 500- 1000 acre areas of black brush community. Spot-burns should be conducted in different areas each year thereafter to encourage a mosaic of different plant communities appealing to different wildlife species;
•At higher elevations, selectively cut large ponderosa pines in small areas to open the canopy for vegetative growth that supports all wildlife. Selective cutting can create vital firebreaks as well;
•Clear small areas of pinion/juniper community on a rotation basis to attract wild horses and other wildlife into different areas;
•Seeding of swales in low elevation areas in late winter to provide temporary feed;
•Building hides or road pull-outs for safe viewing access to wild horses/burros;

•Patrolling roads to prevent illegal or undesirable human interaction with wild horses and burros such as feeding them at paved roads just to get close-up pictures. Alliance members have had success educating the public along Cold Creek roads with photographic handouts of horses injured or killed by cars;
•Building viewing hides similar to bird hides that will allow the public to photograph and observe the horses and burros without touching them.

USFS, BLM and NDOW can review potential range improvement projects, set priorities and develop a plan of implementation for public/private partnerships. Public agencies may contribute some materials while labor and materials will be supplied by Alliance volunteers and experienced volunteers from hunter, hiker, birding and equine groups in the Las Vegas Valley. For example, local hunters are prepared to donate water tanks and help put them in place. The National Mustang Association and other private stakeholders may also contribute funds to certain projects.

IN SUMMARY

This proposed plan for the Experimental Management Area is preliminary; development and implementation of individual projects through public/private partnerships will evolve over time.

However, PZP contraception of all mares and Jennies with selective removal of adoptable young animals are the most urgently needed projects to improve range condition and population control.

The ultimate goal of the Spring Mountain Alliance is to preserve free-roaming bands of wild horses and burros on a healthy range that benefits all wildlife and recreation users in the Spring Mountains.