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Comments:

I endorse the comments of the American Wild Horse Preservation Campaign (AWHPC) on the scoping for the Spring Mountain Wild Horse and Burro Complex Scoping. With AWHPC, I urge the FS incorporate alternatives for this Herd Management Area Plan and Environmental Assessment (EA) that would:

A. Establish a more genetically viable Allowable Management Levels (AMLs) for wild horses and burros living in this complex. The proposed AMLs are too low to ensure genetically viable and thriving populations. The low population numbers will also destroy the great ecotourism potential of these herds, which live near Las Vegas, an international tourist destination.

B. Work in partnership with the Spring Mountain Alliance (SMA) and other community members on a plan to manage these horses on the range at appropriate levels utilizing proven PZP fertility control. SMA volunteer PZP darting teams are already trained and certified to dart as early as September 2013.

C. Keep wild horses and burros within the Complex by repairing and expanding water sources and implementing other range improvements to help the animals utilize all suitable habitat areas.

D. Prohibit helicopter roundups for any wild horses or burros removed from this complex. If any wild horses or burros are to be removed, utilize less traumatic bait trapping methods on these well identified and easily captured animals. Work with the Spring Mountain Alliance to identify and remove only the most adoptable horses and burros and conducting vigorous local adoption drives. Due to the current stockpiling of 50,000 wild horses and burros in government holding facilities, removals must be kept to an absolute minimum.

The National Academy of Sciences' June 2013 report clearly stated that the BLM's business as usual for managing wild horses and burros is expensive and unproductive and must immediately change. This proposal ignores these important and independent scientific findings that removal increases the birth rate in the remaining bands. If PZP treatment of most mares had been continued after the 2007 roundup, the Spring Mountain Complex wild horse population could have been sustained close to AML without need for another costly roundup in 2014.

There is still time to change course to a more sustainable, humane and less taxpayer costly management approach for the Spring Mountains Complex. Due to their proximity to Las Vegas, an international tourist destination, these herds hold great ecotourism potential. Please take this opportunity to implement an experimental volunteer/agency plan that truly protects these national icons on the range so that they may live their lives as nature intended while being enjoyed and appreciated by visitors from all over the world.

Thank you for your consideration.

