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Organization:

Title:

Comments: Dear Forest Service:

I write in response to your request for public comment on the Forest Service's ongoing project to establish a new AML for the Spring Mountains NRA and the Southern NV BLM District.

I wish briefly to address three discrete subjects: (1) your efforts to establish a scientifically based AML, (2) the counterproductivity of the current government practice of periodic gathers to maintain wild horse and burro populations, and (3) vegetation dynamics which are driven largely by climate, not the numbers of grazing animals.

I turn first to the Forest Service's ongoing effort to establish a scientifically valid AML for the Spring Mountains NRA. I applaud the openness and sincerity of the FS approach to this important task.

I submit that prior government efforts to establish an AML for the Spring Mountains NRA have been neither transparent nor have they been based upon a scientific assessment of the capacity of the NRA to support wild horse and burro use. In fact, they appear to be little more than a republication of the original AMLs which had no scientific basis or foundation whatsoever.

The Forest Service's ongoing effort to establish a new AML for the Spring Mountains NRA should be based upon a scientific assessment of the carrying capacity of the range for all animals. Such a scientific assessment has not been completed. Before the FS establishes a new AML such an assessment should be completed.

In any event, I am confident that you will agree that the public should be able to understand the methods used by the Forest Service in establishing a new AML and have direct access to the data upon which the FS has based its decision. Obviously, both data and methods must be scientifically defensible.

Second, I wish to address the counterproductivity of the current government practice of periodic gathers to maintain wild horse and burro populations. I submit that the rapid growth of free-ranging horse and burro populations is in substantial part a direct result of earlier large-scale government removal activities. These removal activities have resulted in wild horse and burro populations that are well below levels that can be supported by available forage.

If wild horse and burro population density were allowed to increase to a point sustainable by available forage there would be much slower herd growth. In sum, government gathers stimulate wild horse and burro population growth because the herds reproduce in an attempt to avoid extermination.

Third, I address vegetation dynamics. It is, I respectfully submit, incorrect for the government to assert that projected forage measurements will support only a static wild horse and burro carrying capacity as expressed in an AML. Vegetation dynamics are driven largely by climate, not the numbers of grazing animals.

I thank you in advance for your consideration of my views.