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Organization:

Title: Sup. Habitat Biologist

Comments: Dear Ms. MacNeill:

The Nevada Department of Wildlife (NDOW) is pleased to see renewed progress by the Forest Service and BLM jointly developing the Spring Mountains Wild Horse & Burro Complex Herd Management Plan (HMAP). As stated in our 2013 scoping comments we support efforts to bring all horse and burro herds into applicable AMLs as stated in the Proposed Action. We also support measures to rehabilitate heavy to overutilized areas, and to protect and ensure uncompromised access to natural and developed water sources critical to wildlife, including species having special or heightened conservation status.

During PEA review there were several statements we believed deserved clarification, among them are:

* [bull] The 2007 gather and removal of the entire Complex likely was the last effort to achieve AMLs; those actions occurring since were conducted by emergency resulting from the 2013 Carpenter 1 Fire, and/or herd health, nuisance, or public safety needs. They were not specifically intended for attaining AMLs.

* [bull] We are reminded of a 2016 gather of 42 burros from the Spring Mountains Ranch State Park remediating the public safety risk and interference with Park restoration. The 2016 gather was not mentioned.

* [bull] At the bottom of page 17 of the PEA, the Response to Public Comments was not obvious among the project files for Scoping or the PEA.

Transitioning into the 21st century, visitation increased exponentially for outdoor recreation, including new uses not represented by more traditional pursuits. Attention to Wild Horse and Burro (WHB) management as integral to sustainable conservation of natural resources and ecosystem services unique to the greater Springs Mountains landscapes became apparent. The Proposed MacNeill, D. (NDOW-SR#: 22-037) 2 October 28, 2021

Action rightly reasserts implementation of the tools required to achieve Spring Mountains WHB Complex AMLs and underscores NDOW's support.

Briefly, it will be crucial for continuation of regularly performed vegetation monitoring and WHB distribution to measure progress in successfully achieving and maintaining a thriving natural ecological balance. Hence, gathers and removals to quickly attain Complex AMLs is strongly recommended as initial efforts with other herd management methods ancillary to assist in longer term population management. We would be pleased to lend our support as we have in the past and look forward to providing support through technical advising, feedback and review, and development of the Final EA and HMAP framework.

Sincerely,

D. Bradford Hardenbrook

Supervisory Habitat Biologist

Nevada Department of Wildlife, Southern Region

cc: Angelita Bullets, District Manager BLM - SNDO

Nevada State Clearinghouse

Glenn Knowles, Southern Nevada Fish & Wildlife Off