

Commentor

Comment

BLM Response

Alison James

Comment 1: Your plan decreases the size of wild horse and burro herds but does nothing to decrease the number of cattle and sheep which have been shown to degrade the range. By not decreasing the cattle and sheep you endanger the state of the range. By taking horse and wild burros of the land, does that leave more opportunity to get more cattle and sheep on the range. Comment 2: Why does the BLM not take into the vast numbers of sheep and cattle? Compared to the number of horses they are so much more than the horses. By their sheer numbers they contribute so much degradation of the range than horses. By rounding up and removing significant numbers of horses, do you not worry about adding to continuing and widespread degradation of the range? That's not to mention an increased fire hazard too?

Response: Although livestock grazing is outside the scope of this document, you may consider adding some additional justification. The reduction of livestock AUMs was not analyzed in the EA because it would not be in conformance with the WDORMP. It is also inconsistent with the Wild Free-Roaming Horses and Burros Act of 1971, which directs the Secretary to immediately remove excess wild horses and burros when a determination is made that such removal is necessary. It was an alternative considered and dismissed in Section 2.5 of the EA. The BLM is mandated to manage for a thriving natural ecological balance and protect the range from deterioration while preserving multiple use relationships such as livestock grazing. The removal or reduction of livestock would not address resource concerns in the HMA that have been directly linked to the current overpopulation of wild horses. Reducing livestock AUMs to increase AMLs would not achieve a thriving natural ecological balance. Horses are present year-round and their impacts to rangeland resources differ from livestock. see

Elizabeth Zarkos

Comment 1: Stop these roundups! There is no good reason to round up these horses! Leave them alone- let them remain on the range free and wild. Comment 2: Stop rounding up these horses- you kill horses during every single roundup. There is no reason to round them up except to placate the desires of cattle ranchers and oil barons. These horses are supposed to be protected- start protecting them instead of killing them.

Response: Comments Noted

Kathy McCoy	<p>What is the point of a new administration, if you keep Trump administration policies???? EVERYONE knows sterilization is not the answer AND is Cruel. You are playing a game. You put out these ridiculous plans, we write our objections. It's not rinse & repeat. It's just repeat. I am disgusted with all of you. A new BLM Director will be coming. Tell me, will there be any difference? I also do NOT see any change from Deb Haaland. Let me tell you something, as a surgical nurse, I had to take of prisoners sometimes. I remember a rapist, where we had to take care of his wounds inflicted by the victim. Compare that to your treatment of innocent Wild Horses, including foals. I cannot convey just how absolutely DISGUSTED I am.</p>	Response: Comments Noted
Michael Knox	<p>Permanent sterilization is NOT acceptable and unnecessary. Remove all cattle & sheep. NO TO REMOVING ANY HORSES & NO TO STERILIZING ANY HORSES. BLM are all corrupt & should be prosecuted for their crimes of destroying our public lands & wildlife with Millions of cattle & sheep. Wild Horses are native to N.America & good for the environment, BLM has</p>	Response: Comment Noted
TakeAction4Horses	<p>fraudulently removed & murdered most of the Horses illegally & there are few left and those left must be protected from removals & cruel torture from BLM 'S experimental sterilization. A WWP perspective on the absurd political theater staged by the livestock industry (and their apologists) to blame wild horses for ecological problems caused by cattle &</p>	Response: Livestock grazing authorization and permitting is outside the scope of the document.

TakeAction4Horses >>>Wild horses are just one more notch in the livestock industry's campaign of Manifest Destiny, to destroy the wilderness, dominate & subdue nature, & make the public lands profitable for themselves. It's time to abandon today's livestock-driven approach to wild horses, get the political agendas out of the way, & embark upon a science-driven approach.<<<

Response: Livestock grazing authorization and permitting is outside the scope of the document.

TakeAction4Horses <https://sierranevadaally.org/2021/04/09/the-ugly-truth-about-the-wild-horse-issue/?fbclid=IwAR0kLI06srXoG44Qflv2ONn6hUsOB--i0w1w7cKi7SLQN95oai-cWHi4ul>
Get the cattle /sheep that outnumber Horses by 50 cattle or more to one horse. Cattle/sheep are invasive species & cattle grazing affects more acres than any other activity on our Western public lands. In fact, cattle grazing has degraded or destroyed over 700 million acres of Western grasslands. Because these impacts are so widespread, CATTLE GRAZING HAS BEEN CALLED THE SINGLE MOST PERVASIVE & DAMAGING ACTIVITY ON WESTERN PUBLIC LANDS.

Response: Livestock grazing authorization and permitting is outside the scope of the document.

TakeAction4Horses

Cattle waste pollutes water sources, & cattle is the greatest non-point source polluter of water in the West. Cattle grazing is also the single greatest cause of biodiversity loss, & the greatest threat to endangered & threatened species. In fact, grazing on public lands has resulted in the listing of 90 endangered & threatened species across the nation. Not only do cattle/sheep consume large amounts of native grasses, but they also trample the soil & microbiotic crusts, resulting in increased erosion & soil compaction, increased runoff, flooding, & the decline of soil nutrients. Cattle also promote the spread of invasive weeds, & destroy streamside vegetation, cause desertification, wildfires & are the leading cause of the Climate Crisis !

Response: Livestock grazing authorization and permitting is outside the scope of the document.

Susan Marie
Dubovsky

I am writing to Oppose the proposed roundup/sterilize plan. In 1971 the Wild Free Roaming Horses and Burros Act was passed unanimously by Congress. "It is the policy of Congress that wild free-roaming horses and burros are shall be protected from capture, branding, harassment, or death; and to accomplish this they are to be considered in the area where presently found as, as an integral part of the natural system of the public lands." Our wild horse and burros are part of the system of public land. They are to be managed as a public lands resource governed under public lands law to be preserved and protected for future generations. That is the law.

Response: The EA and Proposed Action is in conformance with the WFRHBA

Rebecca Knox

I am opposed to the unnecessary roundups on the basis that in reality there is no overpopulation. I am also opposed to the sterilization of the mares because there is a less invasive and less risky proven birth control program.

response: This comment pertains to land-use planning, which has already been completed following an extensive public decision-making process that resulted in a decision to manage at the Appropriate Management Levels within the Calico Complex. Several population growth suppression methods are analyzed throughout the EA and in Appendices C, D, and I. The BLM has concluded that the wild horse herd in the Calico Complex is overpopulated, with respect to the levels of natural resources available that would lead to the maintenance of a thriving natural ecological balance. Specifically, the estimated numbers of animals present is based on recent aerial survey information and reasonable assumptions about annual population growth rates (EA section 1.1). AML for each HMA and for the complex overall was determined in a previous land use decision, based on BLM's multiple use mandate, available natural resources. Utilization monitoring results noted in the EA indicated that wild horses are having measurable effects on natural resources, and those impacts would be expected to increase if herd levels are not decreased. Sterilization of a fraction of the mares would be more likely to reduce annual herd growth rates than reliance on BVD vaccine alone. This is because mares treated

Anne Novak,
Protect Mustangs

We are against the proposed Calico Complex wild horse roundup, fertility control, sterilization, etc. in the Calico Complex Preliminary Environmental Assessment. America's last wild horses should be protected--not managed to extinction.

Response: Comment Noted

The Coalition of
Healthy Nevada
Lands, Wildlife and
Free Roaming
Horses, Nevada Big
Horns Unlimited

Since gathers occurred in 2001, 2005, 2010, and 2012 with limited subsequent gathers, it is clear that BLM is unable to maintain horse and burro populations within AML. We therefore urge gathering a significant portion of the horses and burros at once since the drought continues, reducing both availability and new growth of forage while the remaining horses continue eating and reproducing.

Response: Comment Noted

Elyse Gardner
Walsh, Wild Horse
Education

WHE supports wild horse management on the range, but it must be legal and humane. The alternatives presented here are neither. Therefore, WHE asserts that Alternative 4, the “NoAction” alternative, is the only legal alternative listed, that of no action, the reason being that BLM is authorized only to remove wild horses identified as excess. Therefore, at page 4, the last paragraph of 1.1 Background, BLM clearly identifies the only legal action it is authorized to take at this time: removing horses BLM has clearly identified as excess.

Response: Opinion noted. Alternative 4 does not fit the "Purpose and Need" of the document.

Elyse Gardner
Walsh, Wild Horse
Education

While all or some of these fertility control methods may or may not have value, and may or may not become acceptable and agreed upon by the wild-horse-loving public at some point, Wild Horse Education asserts that any “new” method or strategy in wild horse management must be subjected to the legal process before it is put into practice, before one single horse experiences the “new” vaccine, the surgery, etc. (“New”: any strategy or management method that has not been identified and made part of a legitimate Herd Management Area Plan (“HMAP”).

Response: In the final EA, the BLM has updated the SOPs for IUD use to be more specific. As was true in the preliminary EA, it is clear that only a veterinarian would insert any IUD. It is not necessary that the CAWP include assessment of the IUD protocol. Attachment 2 of BLM IM 2021-002 includes standards for Off-range corral facilities, transportation, and adoption events, which were developed in 2016, prior to the advent of flexible Y-shaped silicone IUDs for wild horses. Using castration as an instructive example of what is and is not included in the CAWP, BLM notes that these CAWP standards mention castration – a commonly practiced procedure in corrals – only twice (“Castration of stallions and jack burros must be performed by a veterinarian using general anesthesia...Stallions and jack burros should be castrated as soon as approved by the on-site veterinarian for the procedure in accordance with BLM policy.” The CAWP does not assess or specify the exact process to be used for any given veterinary procedure. The management use of IUDs or other fertility control methods is reasoned and appropriate if the likely effects of those methods have been analyzed in the appropriate NEPA document (in this case, the EA), with appropriate opportunities for consideration of

Elyse Gardner
Walsh, Wild Horse
Education

This Calico Gather EA has ambitiously included the Surprise Complex in its plans and failed to even mention the recent Surprise Gather EA, Environmental Assessment DOI-BLM-CA-N020-2021-009-EA

Response: Reference to DOI-BLM-CA-N020-2021-009-EA has been included in the final EA

response: The scope of the Calico Complex is in conformance with existing land use plans, multiple use relationship and provisions of Section 1333 (a) of the WFRHBA as amended, to remove excess wild horses and burros from within and outside the Complex and to manage wild horses to achieve and maintain established AML ranges, and to reduce the wild horse and burro population growth rate in order to prevent undue or unnecessary degradation of the public lands by protecting rangeland resources from deterioration associated with an over population and presence of excess wild horses and burros. The management actions within this document are management tools needed to achieve management objectives set forth through the WFRHBA and approved LUPs. The EA is also consistent with the H-4700 Wild Horse and Burro Management Handbook section 2.5
Implementation Decision: Implementation decisions make progress toward achieving LUP goals and objectives and may include: Site-specific population management actions (e.g., decisions to gather/remove excess WHB, apply fertility control, or adjust age or sex ratios. As well as Instruction Memorandum No. 2020-012 Wild Horse and Burro gather planning, scheduling and approval. The RIM has included analysis of

Elyse Gardner
Walsh, Wild Horse
Education

WHE asserts that only through HMAP Revision (or HMAP creation if no HMAP exists) which fully engages the NEPA scoping process, should such a decision be made after public input and scrutiny.

Judith Fader

The EA must seriously address the 1971 Wild Free-Roaming Horses and Burros Act (WFRHBA) requirement that the Calico Complex must be “devoted principally” for the welfare of wild horses. However, to the contrary, the EA shows that the vast majority of forage in the Complex is allocated to private livestock. The EA claims it cannot do "re-allocation of livestock AUMs" to wild horses and burros because they must protect certain “riparian and sensitive areas.” But the EA does not even consider reducing livestock grazing in order to protect these riparian and sensitive areas. You should be able to use Adaptive Management to amend the governing land use plan simultaneously with this EA in order to increase AMLs for wild horses and burros.

Response: Livestock grazing authorization and permitting is outside the scope of the document. The Secretary of the Interior does have the authority to designate HMAs as a wild horse 'Range,' which would be principally devoted to wild horse use, but no such designation has been made for any HMA within the Calico complex.

Judith Fader

The EA must (and fails to) consider the negative impacts that castrating stallions will have on individual animals, family bands and the herd as a whole. Natural hormone production is known to affect many aspects of mammalian biology - including personality, social behaviors, psychology, physiology and overall welfare - and so must be preserved. Since the BLM has already acknowledged that sterilizing males will NOT halt population growth because just one stallion can impregnate many mares, nothing can be gained by gelding stallions. Plus, the National Academy of Sciences (NAS) also has recommended against castrating wild stallions.

- Population suppression tools are analyzed throughout the EA and located in Appendices C, D, and I.

Return to Freedom An untested combination of fertility control mechanisms implemented in the same mare is not rational.

response: No single mare will be treated with a vaccine and IUD or other fertility control application at one point in time. The following text has been added to EA section 2.2: "No mare would be administered an IUD and a vaccine at the same point in time." IUD safety and effectiveness data were provided in Holyoak et al. (2021), which was included in the analysis in the EA and associated appendices. The BLM made no stated or implied claims that further use of IUDs would depend on the observed effects of IUD use at Swasey HMA (Utah). If the purpose of on-range fertility control applications were to learn about their effectiveness, then the commenter is correct that simultaneous application would not allow for an isolated analysis of the effects of one method or the other. However, because the purpose of fertility control application in this case is to reduce annual herd-level growth rates, and thereby to reduce the number of animals that may need to be removed in the future to achieve and maintain a thriving natural ecological balance, it is conceivable that two methods may be applied. The BLM has, in fact, combined fertility suppression techniques in the past, in areas where sex ratio manipulation and fertility control vaccines have both been applied simultaneously.

Return to Freedom If 90% of mares are to receive fertility control, is it some portion of that 90% who would receive a permanent modality, or is it 90% of mares would receive some form of fertility control?

Response: All mares released back to the HMAs within the Calico Complex will be treated with a form of fertility control. Population suppression methods are analyzed throughout the EA and located in Appendices C, D, and I. The descriptions of alternatives 1 and 2 specify that only approximately 1/4 of the total population would include sterile animals. In the preferred alternative, this number is no more than approximately 1/4 of the mares present at low AML.

Laurie Ford	<p>Why is the EA not tiered to any environmental reviews of the livestock grazing allotments that fall within, or overlap the complex so those issues can be identified and analyzed – especially since these allotments have a large impact on the decision making concerning the wild horse and burro populations including, but not limited to, their forage allocation.</p>	<p>Response: Livestock grazing authorization and permitting is outside the scope of the document.</p>
Laurie Ford	<p>The CCEA fails to provide documentation on the 5 livestock grazing allotments that fall within, or overlap, the Calico Complex - Alder Creek, Buffalo Hills, Leadville, Paiute Meadows and Soldier Meadows - for review so that a proper analysis can be made to complete any comments to their fullest extent.</p>	<p>Response: Livestock grazing authorization and permitting is outside the scope of the document. Reference section 3.3.3 for Grazing Allotment analysis.</p>
Bonnie Kohleriter	<p>From this EA it appears AUMs for cattle stand at 22,642 and for wild horses and burros at low AML at 6864. While you may want to put the AUM for a horse at 1.5, you can then put the cow at 1.5 as well as you are considering not just a cow but a cow/calf pair and the cows are considerably larger today. With the imbalance of the AUM s the Calico Complex is not abiding by the 1971 act wherein wild horses and burros are supposed to be where found, principally but not exclusively in those areas, and to have as its purpose a thriving natural ECOLOGICAL BALANCE.</p>	<p>Response: Livestock grazing authorization and permitting is outside the scope of the document. Ecological balance refers to range health, not to an even allocation of forage between livestock and wild horses. For the reasons discussed in EA Section 3.3.8, wild horses and livestock utilize the range differently. Degradation caused by wild horses can only be addressed by reducing the overpopulation, in contrast to livestock that can be removed from the range, limited in where they graze or when (season) they graze.</p>

Nevada Division of Water Resources	<p>All Nevada water laws must receive full compliance. All waters of the State belong to the public and may be appropriated for beneficial use pursuant to the provisions of NRS chapters 533 and 534 and not otherwise. No use of any water required in support of this project, from any source, is allowed without the benefit of a permit or waiver issued by the NV DWR. Water taken from any source, surface or underground, must comply with the permitting provisions of NRS chapters 533 and 534.</p>	<p>Response: NRS chapters 533 and 534 will be and are being followed.</p>
Wild Lands Defense	<p>BLM has failed to justify a need for the whole laundry list of fertility measures, including risky ones, and how they will impact herd dynamics.</p>	<p>Response: Population suppression tools are analyzed throughout the EA and located in Appendices C, D, and I.</p>
Wild Lands Defense	<p>How many allotments have had a current FRH assessment conducted? We can remember few if any recent FRH assessments being conducted by BLM here. In areas like Soldier Meadows, BLM has failed to ever complete a promised new grazing EA - despite promises made well over a decade ago. All BLM has done is allow ranchers to increase water hauling – essentially allow cattle to MINE forage from remnant previously less abused and degraded sites. While BLM claims the public should not comment on grazing – the truth is the landscape of the Calico Complex is going to hell in a handcart due to BLM’s failure to deal with severely abusive livestock grazing taking place</p>	<p>Response: Livestock grazing authorization and permitting is outside the scope of the document. Reference section 3.3.3 for Grazing Allotment analysis.</p>
Wild Lands Defense	<p>Alternative 1 fertility control options cumulative effects are not analyzed in any form. There is no rigorous scientific analysis or hard look NEPA analysis.</p>	<p>Response: Population suppression tools are analyzed throughout the EA and located in Appendices C, D, and I.</p>

Wild Lands Defense

BLM states compliance with the Comprehensive Animal Welfare Policy and erroneously states that all fertility control would be done in compliance with CAWP.

Response: In the final EA, the BLM has updated the SOPs for IUD use to be more specific. As was true in the preliminary EA, it is clear that only a veterinarian would insert any IUD. It is not necessary that the CAWP include assessment of the IUD protocol. Attachment 2 of BLM IM 2021-002 includes standards for Off-range corral facilities, transportation, and adoption events, which were developed in 2016, prior to the advent of flexible Y-shaped silicone IUDs for wild horses. Using castration as an instructive example of what is and is not included in the CAWP, BLM notes that these CAWP standards mention castration – a commonly practiced procedure in corrals – only twice (“Castration of stallions and jack burros must be performed by a veterinarian using general anesthesia...Stallions and jack burros should be castrated as soon as approved by the on-site veterinarian for the procedure in accordance with BLM policy.” The CAWP does not assess or specify the exact process to be used for any given veterinary procedure

Lyn McCormick

It is my humble opinion that the only common sense, cost effective and humane way forward is to transition the WH&B program budget to ON the range management. The Stakeholders should be given contracts to manage the WH&B's on the HMA's This could be done cost-effectively & humanely for \$1 - \$2 / day per / head. The ranchers / permittees, in my opinion are the most qualified, equipped, and from a purely common sense perspective the best candidates for ON the range management contracts. Finally, just as the current "path forward" dictates, the contracts should allow for a 10 year time frame to reduce the WH&B population growth rate to less than 10% or whatever population level (AML) is appropriate and necessary to achieve "thriving ecological balance" on the range.

Response: Opinion Noted

American Wild
Horse Campaign

AWHC strongly encourages the BLM to begin immediate implementation of a comprehensive vaccine-based fertility control program for the Complex and to abandon any plan for the use of mass roundup and removal with untested, unproven fertility control.

Response: Population suppression tools are analyzed throughout the EA and located in Appendices C, D, and I. The commenter's implication that fertility control methods analyzed in the EA are untested is in error. The literature review associated with each contemplated method provides indication of the available scientific information.

American Wild
Horse Campaign

The inclusion of IUDs in the proposed alternative is experimental and therefore the impacts cannot be properly analyzed in the EA because they are unknown.

Response: Population suppression tools are analyzed throughout the EA and located in Appendices C, D, and I. The effects of IUDs were analyzed in the EA and Appendices. IUDs were proven safe and effective in a pasture trial, in which treated mares moved freely throughout large pastures, with fertile stallions (Holyoak et al. 2021). The NAS (2013) suggested that the major drawback of IUDs available at that time were that they were not retained in the uterus for long periods of time; the newer models of IUDs developed and tested since then have acceptable retention rates (Holyoak et al. 2021). All available scientific indications are that silicone IUDs are safe and effective. Other forms of IUDs have been used in mares for decades or longer, and the EA includes analysis of the dangers of using certain types of materials for IUDs, such as metallic or glass materials. Despite the commenter's contention, management application of IUDs in wild mares would not be part of any experiment; rather, such use would be a management application of a proven fertility control method. The BLM is not structuring the application of IUDs in the Calico Complex as part of an experiment.

American Wild
Horse Campaign

inclusion of non-surgical methods of sterilization for mares in the proposed alternative is experimental and therefore the impacts cannot be properly analyzed in the EA because they are unknown

Response: Population suppression tools are analyzed throughout the EA and located in Appendices C, D, and I. Available evidence indicates that minimally invasive mare sterilization techniques are humane, safe, and effective. The EA and appendix D includes a review on methods and expected effects of minimally invasive mare sterilization methods, based on available scientific literature. Any management application of minimally invasive mare sterilization techniques would make use of method(s) that has (have) been tested and proven safe and effective in domestic mares. The EA includes stipulations for animal welfare protection, such as requirements about the pregnancy status of candidate mares (not pregnant), and requirements for veterinary care.

American Wild Horse Campaign	Past field studies on wild horses fitted with radio collars have resulted in injuries and deaths.	Response: Concern noted. Any mares fitted with radio collars will be monitored after release into the HMAs within the complex. No mortalities have been recorded in BLM-collared mares in the last decade, which includes the time period when any collar on mares has been required to include timed and triggerable drop-off mechanisms. The design and application of radio collars used on BLM-managed wild mares in the last decade has not led to any notable injuries in captive trials (Schoenecker et al. 2020. Evaluation of the impacts of radio-marking devices on feral horses and burros in a captive setting. Human-Wildlife Interactions 14:73-86.) or in the wild (Kathryn Schoenecker, US Geological Survey, unpublished data).
American Wild Horse Campaign	AWHC asks that the EA further analyze alternative methodologies for wild horse removal including the exclusive use of bait/water trapping.	Response: Bait and water trapping is considered and analyzed and may be used if the purpose and need is fulfilled. An alternative to exclusively use bait and/or water trapping was considered but dismissed from further analysis for the reasons listed in the Section 2.5 of the EA.
The Cloud Foundation	The EA states that horses/burros must be removed to maintain a "thriving natural ecological balance" (TNEB). The EA fails to provide any scientific data that shows the removal of livestock could not achieve the same objective.	Response: Livestock grazing authorization and permitting is outside the scope of the document.
The Cloud Foundation	The EA fails to adequately analyze the effects of Gonacon which effectively destroys the ovary and/or ovary function.	Response: Population suppression tools are analyzed throughout the EA and located in Appendices C, D, and I.

The Cloud
Foundation

While the oviduct blockage procedure(s) may be viable and humane fertility control options for the future, there is currently insufficient data to implement such an action on the range.

Response: Population suppression tools are analyzed throughout the EA and located in Appendices C, D, and I. Available evidence indicates that minimally invasive mare sterilization techniques are humane, safe, and effective. The EA and appendix D includes a review on methods and expected effects of minimally invasive mare sterilization methods, based on available scientific literature. Any management application of minimally invasive mare sterilization techniques would make use of method(s) that has (have) been tested and proven safe and effective in domestic mares. The EA includes stipulations for animal welfare protection, such as requirements about the pregnancy status of candidate mares (not pregnant), and requirements for veterinary care.