

December 19, 2019

To: blm_nv_nvso_research@blm.gov

From: Coalition for Healthy Nevada Public Lands, Wildlife, and Wild Horses

Subject: BLM Oocyte Growth Factor Vaccine Study

Preliminary Environmental Assessment DOI-BLM-NV-0000-2020-0001-EA

Nevada BLM in cooperation with the USDA , Animal and Plant Health Inspection Service's National Wildlife Research Center proposes to test whether the effectiveness of a one-dose oocyte growth factor vaccine will safely provide a contraceptive on wild mares. If successful the contraceptive will either provide longer term or permanently sterilize mares without impacting their health and well-being. Currently, mares, if inseminated, provide a foal every year without regard to the mare's age or health. Current contraceptives are temporary requiring mares to be darted every year and sometimes twice. With Nevada's wide open spaces and vast herds of horses, effectively capturing and darting sufficient mares every year is hard on the horse herds, expensive, and therefore, largely ineffective, leading to annual wild horse population increases.

The study will take place in the Northern Nevada Correctional Center (NNCC) near Carson City, which has the experience and facilities to work with wild horses. The 16 mares selected for the project will be well cared for. Half the mares will receive the contraceptive; the other half, the control group, will not. Stallions will visit both sites. Any foals born will be treated as wild horses and available for adoption.

BLM's wild horse population in Nevada is currently 43,281 far in excess of the 12,811 maximum population initially proposed. In addition to BLM horses are another 10,000 horses on military, US Forest Service, state, and tribal lands. Horses, where sufficient forage exists, are expanding at 20% per year impacting the range and wildlife. In some areas horses are undernourished or starving, an unacceptable situation.

BLM needs a fertility control method that is minimally intrusive to both the individual horse and the herd, while assuring that herds will not exceed AML. And horses outside the HMAs diminish over time. We support BLM's study for its goal of piloting a multiyear fertility control method and appreciate that one of the partners is NNCC.

Of concern is the three year length of the study. If the results are found to be applicable, it may be four or five years before, the fertility vaccine can be used in the field. With a 20% wild horse increase per year, how many more horses will be roaming Nevada lands and impacting a limited forage base by the time the study is completed? Secondly, the control group of mares will be producing foals, adding to the need for more adoptions. How extensive is the adoption market?

We are particularly concerned about reliance on fertility control methods that require porcine ingredient, which may become limited. Therefore we support looking at other forms of fertility control studies, including the one in this experiment ,as well as spaying and gelding, adoptions and removal to greener pastures to limit reproduction on public lands where horses exceed AML

Nevada's wild horses, one of the many uses of public lands, are a pleasure to see and enjoy. We all own them and have some responsibilities. The challenge is to ensure that horse populations do not impair a healthy landscape. This requires limiting their populations for their own survival and that of the forage they, wildlife, and pollinators need.

An EA seems sufficient for this modest study. An EIS should not be required. We support this project and look forward to seeing the results.