



April 1, 2020

Amanda M. Dodson, Field Manager
Bureau of Land Management
Kingman Field Office
2755 Mission Blvd.
Kingman, AZ 86401

RE: Comments on the Black Mountain Herd Management Area (HMA) Wild Burro Gather and Population Control Plan Environmental Assessment (EA) for the Bureau of Land Management's (BLM) Kingman Field Office (KFO) and Lake Havasu Field Office (LHFO)

Dear Ms. Dodson:

Arizona Sportsmen for Wildlife Conservation (AZSFWC) is a 501c-3 nonprofit organization dedicated to wildlife conservation, habitat work, youth recruitment and retention, as well as educating sportsmen and women on issues important to their passions. AZSFWC consists of 39 member, affiliate, and associate groups that reach across the spectrum of hunting, angling, shooting, outdoor recreation and businesses from all across Arizona. Our member groups represent in excess of 10,000 sportsmen and women from Arizona.

AZSFWC appreciates the opportunity to comment on the BLM's proposed EA for burros in, on and around Black Mountain. Suffice it to say the appropriate management level (AML) of 478 animals in this HMA is in dire need of active management to reduce the herd size accordingly, particularly based on BLM estimates of over 2200 animals currently on the ground.

AZSFWC realizes the AML for this HMA won't happen without a great deal of effort and the employment of a variety of resources. To that end, AZSFWC supports the Arizona Game & Fish Department (AZGFD) recommendations as outlined in their March 31, 2020 comment letter on the subject, including Population Monitoring, Helicopter Gathers and Bait Trap Locations. Attached is the AZGFD letter for reference.

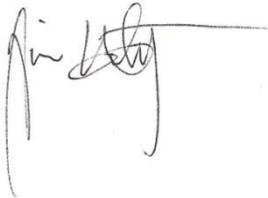
AZSFWC would also concur with AZGFD's support for Alternative A. We wholeheartedly support population control efforts to bring these animals within the recommended herd size as soon as possible. The importance of that objective

cannot be understated due to the adverse impacts the current number of animals are having on native wildlife and wildlife habitat.

Finally, again in reference to AZGFD's comments on the timing and length of this management effort, AZSFWC appreciates the BLM's consideration of the scheduled big game hunts that would be underway during the proposed time frame. Many sportsmen and women wait a long time for certain tags, particularly desert bighorn sheep tags, so while we are in full support of bringing the burro population under control, deference to some of these hunt dates are important too.

Thank you!

Yours in Conservation,

A handwritten signature in black ink, appearing to read "Jim Unmacht", with a long horizontal line extending to the right.

Jim Unmacht
Executive Director

Cc: Ty Gray, Director AZGFD

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