

Public Comment for Upcoming Commission Meeting

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Comments:

RE: RESOLUTION NO. 5-10-23-11a
Free-Roaming Horse Feeding Ban

I question the wisdom of this ordinance.

The preamble states that “ticketing for speeding...will not be effective [for public safety].” However, the sheriff’s department had admitted in its last annual report stated that it was not aggressively ticketing drivers for speeding, but rather only issuing warnings. Therefore, it would seem to be premature to claim that speeding tickets would not be effective. It is also stated that “expanding patrols” would also be ineffective. Again, have expanded patrols proven to be ineffective? In addition, wouldn’t expanded patrols be needed to enforce the ordinance?

Regarding roadway safety, other jurisdictions have been addressing the problem with more innovative thinking. A 2021 press release reports that a grant from the Governor’s Highway Safety Association, the Insurance Institute for Highway Safety, and the National Road Safety Foundation is funding a pilot comprehensive speed management program (<https://www.ghsa.org/resources/news-releases/GHSA/speed-pilot-maryland22>). This project adopted a multi-pronged approach to road safety. A 2022 article reports that the Daton, Nevada dept. of transportation was installing 8 miles of fencing along U.S. 50 (<https://www.kolotv.com/2022/01/09/more-wild-horse-fencing-being-installed-dayton-area>). A 2023 article, “South Reno Wild Horse Collisions Dropped in 2022 after spiking in 2021,” reports success in reducing vehicle-horse collisions in the Reno, Nevada vicinity (<https://www.rgj.com/story/news/local/2023/02/02/tahoe-reno-nevada-wild-horse-vehicles-collisions-2022-data/69864689007/>)

The 501(c)(3) requirement for a permit puzzles me. Has the Commission consulted with any of these organizations to insure that they have the resources and manpower to undertake any kind of feeding program? If an organization has “demonstrated experience and knowledge in the care of horse management and protection,” why does it need 501(c)(3) status? Why would the Commission assume that any persons assigned to feed horses under the auspices of such an organization would not be properly trained and instructed?

The “no feed” zone is not specified except as “adjacent to any public road.” The failure to provide a specific boundary leaves any permit applicant open to a long harangue over what constitutes “adjacent.”

The “Third-Party Evaluation” section calls for hiring a consultant who then makes recommendations to the Director of Planning and Zoning. Although newly hired department head Michael Galizio has strong qualifications in local governments and political science, I see no evidence of expertise in wild horse management or environmental preservation. I wonder what skills he would bring in order to evaluate the consultant’s report with a critical eye. It makes more sense to me for the consultant to deal directly with the stakeholders in wild horse feeding management and develop a cooperative rather than adversarial relationship.

The penalty for violating the ordinance is oddly severe, much higher than speeding tickets in New Mexico in general (see:

<https://www.drivinglaws.org/resources/traffic-tickets/speed-violations/new-mexico-speeding-laws.htm>). In addition the ordinance also calls for jail time. I have stated before that criminalizing residents who actually care about the horses was a poorly thought out remedy.

Finally, there is no indication that the feeding ban will be evaluated for its effectiveness in achieving its broad range of goals.

The Commission continues to ignore the real issue of management of free-roaming horse herd sizes. According to the Mt. Taylor Mustangs Report for 2023, Q-1, contraceptive treatment with PZP has been effective.

https://www.sandovalcountynm.gov/wp-content/uploads/2023/04/CY23_Q1_MTM_Update.pdf).

Are wild horse being tracked so that proactive measures can be taken? PZP treatment as a long-term measure to manage the population of bands needs to be pursued, particularly given the effects of climate change. Research on advanced equine contraceptive regimens is being conducted and the Commission needs to make itself aware of new developments.