



Battle Mtn Dist
Bald mtn HMA

10/9/80

ROBERT LIST
GOVERNOR

JOSEPH C. GREENLEY
DIRECTOR

1100 VALLEY ROAD

P.O. BOX 10678

RENO, NEVADA 89520

TELEPHONE (702) 784-6214

October 9, 1980

Mr. Mike Nolan
State Clearinghouse
Office of the State Planning Coordinator
Capitol Building
Carson City, Nevada 89710

Dear Mike:

The Nevada Department of Wildlife appreciates the opportunity to review and provide comments on the draft Environmental Assessment for the Bald Mountain Wild Horse Area, SAI #81200031.

The Department has several concerns pertaining to this proposed action including the following:

Departmental personnel support removal of wild horses from the Bald Mountain Wild Horse area. However, some portions of the data base which was used in the Environmental Assessment are subject to question.

Our major concerns are as follows:

The E.A. wild horse population estimate of 734 horses is based on an outdated October, 1979 survey that assumes that the number of horses observed is equal to the total population. Recruitment of 1979 colts to the 1980 adult population is not accounted for in the E.A. Aerial surveys do not result in observation of 100% of the population and a population estimate based on an 85% observation rate would seem more realistic. The Bureau estimates an annual rate of increase of 12.5% for wild horses in the Bald Mountain area. More recent information obtained by Bureau personnel in the Winnemucca District show annual rates of increase of 18%. Failure to account for total potential colt recruitment and assuming a 100% observation rate will result in an under-estimation of wild horse numbers and cause unanticipated damage to range resources.

The proposed wild horse inventory and removal area should be expanded south along the Toiyabe Range to Callahan Creek on the east slope and Boone Creek on the west slope. Expansion of the inventory and removal area to include the Boone Creek, Iowa Canyon, Callahan Creek, Skull Creek and Cowboy Rest drainages would provide severely needed control of wild horse numbers in critically important mule deer and sage grouse habitats. Department helicopter

and ground surveys in these areas have shown horse numbers to be increasing while mule deer, sage grouse and watershed values are being lost. The recommended expansion of wild horse gathering activities includes some of the highest potential sage grouse habitat in Lander County as well as the highest density deer population in Management Area 15. Both species of wildlife are currently at numbers below their potential and Department personnel cite deterioration of the range resource as the primary cause.

In summary, Department personnel recommend that the Bureau modify their population estimation to account for horses not observed during the inventory process, modify the overall population estimate to account for recruitment of 1979 colts to the 1980 adult population, re-evaluate recruitment rates based upon the best information available and expand the wild horse inventory and removal program to include identified areas of critically important wildlife habitat.

If you have any questions concerning this matter, please contact this office at your earliest convenience.

Sincerely,



Joseph C. Greenley
Director

VKJ/ba