G 4/20/76

Environmental Analysis Record
for the
Removal of Wild Horses
and the establishment
of the
Flanigan Wild Horse Area
in the
Pyramid Planning Unit

Location

Bureau of Land Management
Pyramid Planning Unit (0306)
found in the
Southern 1/3 of Washoe County, Nevada

ADDENDUM

Flanigan Wild Horse Herd Management Area Plan
and
Environmental Analysis Record

The Flanigan Wild Horse Herd Management Area Plan proposes permanent management facilities in the herd area.

It is the decision of the District Manager to use temporary facilities until such time as the United States Supreme Court rules on the constitutionality of Public Law 92-195.

Permanent facilities affected are:

Upper Adobe water trap
East Virginia Peak wing trap
Cottonwood Canyon wing trap
13½ miles fence construction
Marl Holding and Sorting corral

An interdisciplinary team has assessed the environmental impacts of the proposed action which includes the herd management area plan and the horse removal in the Pyramid Planning Unit. It is the decision of the interdisciplinary team that the substitution of temporary facilities for permanent facilities will not create any additional environmental impact.

CONTENTS

INTRODUCTION

The proposed action (see page 3) is taken from Pyramid Planning Unit Management Framework Plan Step III decision which states:

1. Establish an intensive wild horse management area in the Flanigan area. Maintain in that area the current population of about 100 horses (1973). This area is considered to be particularly suitable for intensive wild horse use because it has few developments that would restrict their movements and receives little wildlife use.

2. Conduct studies to determine the biological requirements of this herd. Based on these studies, determine the optimum number of wild horses that can be maintained in this intensive management area and adjust numbers accordingly.

3. Remove wild horses from other identified use areas for the following reasons:

   (a) The wild horses in the Fort Sage Mountain and Granite Peak areas (see map) will be removed because of the intense use these areas receive from the Lassen-Washoe interstate deer herd, whose numbers are declining.

   (b) The wild horses in the Pah Rah Mountains will be removed because of the fragmented land patterns of national resource lands and because of the proposed housing development in the adjacent Spanish Springs Valley.

   (c) The wild horses in the Mahogany Flat and Dogskin Mountain areas will be removed because their small number (about 13) cannot be adequately managed at their present locations.

4. Relocate as many animals from these areas as possible into the Flanigan Wild Horse Management Area. When this becomes impossible because of over-population of the Flanigan herd, give away as many animals as possible to interested parties on a custodial basis for private maintenance. If suitable homes cannot be found for all, the remaining animals should be destroyed humanely.

An activity plan for the Flanigan Wild Horse Management Area has been prepared. The Environmental Analysis Record is an assessment of the activity plan as well as the Management Framework Plan Decision for wild horses.

The activity plan proposes to gather all of the horses in the Flanigan Allotment (130 animals), determine which are estrays, and return 75 wild horses to the herd management area. Should less than 75 wild horses be returned to the herd management area, wild horses from other herds in the planning unit would be introduced into the area. The return of 75 wild horses will allow for a one or two year increase to the proposed population

level of 100 animals. Forage will be reserved for 100 wild horses (1200 AUMs) in the herd area. The Flanigan Wild Horse Herd Management Area Plan identifies permanent facilities (see Table 1) which will be required to manage the herd.

In the remainder of the planning unit, the following horses are recommended for removal:

Herd Name	1975 Population
Fort Sage Mountain herd	21
Mahogany Flat herd	5
Dogskin herd	9
Granite Peak herd	10
Pah Rah herd	119
	164

Temporary traps will have to be constructed to gather the horses throughout the planning unit.

I. DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

A. Proposed Action

Establish an intensive wild horse management area in the Flanigan Allotment. Construct permanent management facilities for the gathering and maintenance of the herd. Remove all of the horses from the Flanigan Allotment and return 75 wild horses to the wild horse area.

Construct temporary facilities and remove all other horses from the remainder of the Pyramid Planning Unit.

B. Stages of Implementation of the Proposed Action

1. Construct management facilities, both temporary and permanent, in the Pyramid Planning Unit.

   Discrete Operations (All discrete operations include limited ORV travel.)

   a. Trail and pipeline construction

   b. Trap and corral construction - temporary and permanent

   c. Fence construction - permanent

2. Gather approximately 294 horses in the Pyramid Planning Unit and return 75 wild horses to the federal range in the Flanigan herd area. Dispose of the excess horses.

   Discrete Operations

   a. Gathering

   b. Horse handling

   c. Decreased horse population

3. Maintain the Flanigan herd at 100 animals. (All discrete operations include limited ORV travel.)

   Discrete Operations

   a. Maintain facilities

   b. Dispose of excess horses

   c. Recreational activities in the wild horse area

C. Alternatives to the Proposed Action

Alternative 1
No action.

Alternative 2

Attain the proper stocking rate in the Pyramid Planning Unit while maintaining the horse population at the 1971 level by making required adjustments in livestock.

Alternative 3

Attain the proper stocking rate in the Pyramid Planning Unit by equally reducing livestock and horses after the horses are reduced to their 1971 level.

Alternative 4

Attain the proper stocking rate by removing all horses from the federal range in the Pyramid Planning Unit. No livestock reductions would be made.

Alternative 5

Attain the proper stocking rate by continually reducing livestock. No horse reductions would be made in the affected allotments until the proper stocking rate is reached by horses.

II. DESCRIPTION OF THE EXISTING ENVIRONMENT

AIR

Air movement patterns are frequently related to topographic features. The long, narrow canyons, for example, often display a cyclic sort of air movement; as morning temperatures climb, a natural ventilation effect causes winds to move up through the canyons. This pattern is reversed as evening temperatures drop. Orientation, of course, affects this phenomenon.

Across the broad valleys air movement is characteristically from the west and southwest. These winds are often powerful and gusty, especially during the summer months.

Temperatures across the area are likewise affected to some degree by topography. For example, in those canyons displaying the natural ventilation discussed above, the air is commonly being moved and usually prevents extreme low temperatures. A random examination of temperatures (degrees Farenheit) for locations in or adjacent to the area shows the following:

	January average		July average	
	High	Low	High	Low
Fernley	42	20	96	59
Reno	44	18	90	49

The entire area north of Reno, Nevada can be considered rural in nature with only relatively small settlements within its boundaries. The major forms of industry (agriculture, livestock ranching and tourism) are basically not air-polluting types. The main source of particulate matter is from wind erosion of the relatively light-textured soils. Although some of this material results from agricultural activities, the majority comes from natural climatic or geologic events (i.e., gusty winds moving across barren landforms devoid of vegetation). Unless surface disturbance radically alters this "natural pollution", particulate matter is not a significant factor of the air quality across the area.

Normal traffic and tourism presently contribute insignificant amounts of carbon monoxide, nitrogen oxides, etc.

Non-ionizing radiation is negligible, but probably occurs along the paths of high voltage transmission lines.

LAND

The area lies within the Basin and Range Province, a region characterized by isolated, elongate, subparallel mountain ranges and broad intervening valleys. All drainage leads to enclosed interior basins rather than discharges into the sea, and for this reason the area is within the Great Basin subdivision of the province.

The mountain ranges generally trend north or northeast, and in most cases rise abruptly from the coalescing alluvial fans that border them. Playa lakes occupy low parts of some enclosed basins. Many of the flat-floored valleys are relics of more extensive lake beds formed when ancient Lake Lahontan covered a large portion of western Nevada.

Two prominent mountain ranges are included with this area: the Pah Rah Range and the Virginia Range. The highest point of elevation within the area is Tule Peak, which is 8,722 feet above sea level. Also included are mountains such as Fort Sage Mountain and Dogskin Mountain. The highest of these ranges have elevations between 6,000 and 8,000 feet above sea level.

The included valleys and playas generally have elevations between 4,000 - 5,000 feet. Some of these are: Honey Lake Valley, Winnemucca Valley and Warm Springs Valley.

The fault-blocked mountain ranges offer dramatic contrasts in topography and have created a complex geologic picture; the soils displayed across the area are subsequently complex.

WATER

Varied demands exist for water in the area. These include demands by rural use, irrigation, and recreation. Water in this area is definitely a limiting factor to population growth and industrial development. (Nevada Department of Natural Resources, Water for Nevada Report #2, 1971)

Precipitation, Recharge and Discharge

About 54 million acre feet of water fall on Nevada each year in the form of rain and snow. Only about 3.2 million acre feet run off from the mountains and about 2.2 million acre feet recharge the ground-water reservoirs. The rest of the water continues in the hydrologic cycle through evaporation and transpiration.

Precipitation is generally absent on the valley floors, so very little reaches the ground-water reservoirs; most of the valley recharge comes from precipitation and snowmelt in the adjacent mountains. Water reaches the ground-water system by seepage from streams on alluvial aprons and by percolation through consolidated rocks. Even so, most of the precipitation and meltwaters evaporate before infiltration and only a small amount recharges the ground-water reservoir.

Mean annual precipitation, in inches, from stations around the area (from published records of the United States Department of Commerce):

Station	Annual Precipitation	Period
Carson City	11.83	1936-1965
Glenbrook	19.17	1945-1970
Reno	7.39	1936-1968

VEGETATION

The two vegetation communities of the area are the Northern Desert shrub and Juniper communities.

Northern Desert Shrub

This vegetation community includes both big sagebrush and low sagebrush communities, in some places existing in almost pure stands, and in others, as a mixture. Rainfall averages from 8 inches to 25 inches annually. Soils are generally moderately coarse (sandy loam) to medium-textured (loam, silt-loam), and medium (10" to 16") to deep (more than 16") in the sagebrush community. Soils in the low sagebrush are generally shallower and more finely textured.

Community dominants are either big sagebrush or low sagebrush. Other common shrubs include bitterbrush, squaw tea, rabbitbrush, and horse-brush. At the higher elevations snowberry, currant, and mountain mahogany are found, along with forbs such as mule ears, balsamroot, and lupine. In the better areas (with higher elevations and less accessibility), grasses, such as needlegrasses, bluegrasses, Great Basin wild rye, and bluebunch wheatgrass, comprise most of the vegetation. Where fire has occurred, bunchgrass communities have started. These areas are very productive. At lower elevations (Granite Peak), the condition is generally poorer and the grasses are mainly cheatgrass and squirreltail, in addition to a few perennials.

Juniper

This community occupies about the same elevation as northern desert shrub. Rainfall varies from 10" to 18" annually. Soils are generally medium in depth and texture, except on rougher sites which have poorer soils.

The community is dominated by juniper with sagebrush as the predominant understory shrub species. Species composition is similar to the northern desert shrub and the juniper is a significant part of the community. Other common shrubs include low sagebrush, squaw tea, and rabbitbrush. Grasses are the same as those of the northern desert shrub community.

Major plant species occurring in the northern desert shrub and juniper communities are:

Trees

Utah juniper	Juniperus osteosperma
Quaking aspen	Populus tremuloides

Shrubs

Big sagebrush	Artemisia tridentata
Hop sage	Grayia spinosa
Bitterbrush	Purshia tridentata
Spineless horsebrush	Tetradymia canescens
Rubber rabbitbrush	Chrysothamnus nauseosus
Low rabbitbrush	Chrysothamnus viscidiflorus
Spiny horsebrush	Tetradymia glabrata
Low sagebrush	Artemisia arbuscula
Mountain mahogany	Cercocarpus ledifolius
Squaw tea	Ephedra viridis
Desert peach	Prunus andersonii
Currant, gooseberry	Ribes spp.
Rose	Rosa spp.
Snowberry	Symphoricarpus spp.
Serviceberry	Amelanchier alnifolia
Prickly phlox	Leptodactylon pungens
Shrubby eriogonum	Eriogonum spp.

Grasses

Sandberg bluegrass	Poa sandbergii
Nevada bluegrass	Poa nevadensis
Cheatgrass	Bromus tectorum
Squirrel tail	Sitanion hystrix
Indian ricegrass	Oryzopsis hymenoides
Great Basin wild rye	Elymus cinereus
Bluebunch wheatgrass	Agropyron spicatum
Needlegrass	Stipa spp.

Forbs

Arrowleaf balsamroot	Balsamhoriza sagittata
Indian paint brush	Castilleja spp.
Lupine	Lupinus spp.
Phlox	Phlox spp.
Mule ears	Wyethia amplexicaulis
Buckwheat	Eriogonum spp.
Skeleton Plant	Lygodesmia spinosa
Locoweed	Astragalus spp.

ANIMALS

A diversity of animals is found in the area. The distribution and abundance of these species are greatly influenced by the presence of the vegetative zones discussed earlier.

Mammals

Terrestrial animals range from big game species to shrews, bats, weasels, cats, rodents, rabbits, and wild horses. Hall (1946) estimates the average population of mammals in Nevada to be about 20 per acre (most of which are rodents).

Big game animals include antelope and mule deer. The resident deer herds are found in the Virginia Mountains, Pah Rah Mountains, Fort Sage and the Dogskins. Deer herds on the west side of the area are predominantly migratory. These animals (Lassen-Washoe interstate deer herd) summer in the Sierra Nevada Mountains and move into winter areas in Nevada.

Fort Sage, Granite Peak and Dogskin Mountains are deer wintering areas. The carrying capacity of the deer winter range is often considered critical to the deer herds in the western United States. This is because the amount of accessible range for deer is restricted due to snow, and the forage available may not be abundant or nutritional enough to support the animals. Fort Sage, Dogskin Mountains, and Tule Peak are also critical deer yearlong and summer range.

Three small antelope areas exist here, and all receive yearlong use. The antelope area west of Dogskin Mountain is the smallest, amounting to about 2,300 acres.

The two larger areas are in the vicinity of Spanish Springs Peak and Tule Peak, and are about 21,000 and 11,000 acres respectively. There are about 50 antelope in the planning unit. Antelope sightings have been made throughout the area.

Seventeen species of bats inhabit the caves, mines, tunnels, tree-covered areas, old buildings, and niches in rocks. The spotted bat, a rare species, has been sighted in the area (Hall, 1946). Two species of weasels frequent brushy or wooded areas near water. The bobcat is common to areas where rocky ledges and outcroppings occur. Over 35 species of rodents, four species of rabbits, including the mountain cottontail, can be expected to occur here.

Six wild horse herds exist in the Pyramid area (see Figure 1). Horses are one of the few mammals for which a population inventory exists (see Table 5 and Figure 1). No forage has been allotted for horses in the Pyramid area at the present time. The displacement of other animal species by horses has not been documented.

Birds

Over 250 species of birds are known to occupy the area during different seasons of the year.

Four species of upland game birds, including sage grouse, chukar partridge, mourning dove, and mountain quail, are found here. Sage grouse and chukar partridge are the most important species in the area because of their abundance. Mourning dove and chukar partridge occur throughout the area. Crucial habitat for mourning dove and chukar is considered to be any water source. The mountain quail are found in the Virginia Range. The remaining birds are non-game species, such as raptors and a variety of song birds. These birds can be seen in every habitat type in the area. Many are seasonal residents.

Threatened raptor species in the Pyramid area include the peregrine falcon and southern bald eagle. Sightings of the peregrine falcon suggest that its occurrence in Nevada is extremely rare.

Amphibians and Reptiles

Thirty-two species of amphibians and reptiles are known to occur in the Pyramid area. These include spadefoot toads, true toads, frogs, true frogs, lizards, snakes and turtles. Habitat for these species exists throughout the area. None of these amphibians or reptiles are threatened.

Fish

No fish exist within the wild horse herd areas.

Man

The national resource lands and private lands throughout the area are grazed by livestock. Predator control is conducted by various groups to protect livestock. Waters (wells, springs, and reapers) developed primarily for livestock have benefited wild horses and wildlife.

While deer are the only big game, upland game birds are hunted throughout the area.

Deer winter areas and migration routes have become severely encroached upon by developments (housing, highways, etc.) along the eastern front of the Sierra Nevada. As the developments continue, deer winter areas and migration routes become more and more critical.

The wild horse herds are assumed to have originated from ranch stock which were turned loose or escaped. Before 1971, these herds were controlled by ranchers and others. Since the passage of the Wild Horse and Burro Act of 1971, the herds have been largely uncontrolled.

Fire suppression is conducted by local governments, the State of Nevada, and the Bureau of Land Management.

ECOLOGICAL INTERRELATIONSHIPS

Succession is a process in which a site becomes progressively occupied by different plant and animal communities. The community which is relatively stable over a period of time is the climax vegetation for the site.

Important climax plant species in the area include big sagebrush (*Artemisia tridentata*), juniper (*Juniperus osteosperma*), needlegrasses (*Stipa* species), and bluebunch wheatgrass (*Agropyron spicatum*). Domestic livestock grazing has controlled or dictated plant succession on much of the area. Year-round grazing has reduced the density and composition of the more palatable climax species and even eliminated them in some locations. As a result, the less palatable browse species, such as big sagebrush, rabbitbrush, and juniper, have increased in density in the more accessible areas. Grass species have changed from the climax perennials to annuals, such as cheatgrass (*Bromus tectorum*), mustard (*Brassica* species), and filaree (*Erodium cicutarium*).

Natural succession back to the climax community may take decades due to the competition from these annuals. Recurring fires and/or heavy herbivore use can retard natural succession and maintain the annual community indefinitely.

Plants supply the basis for the food chain in the ecosystem. These plants (grasses, forbs, shrubs, trees) supply the food for the animal community, including small mammals (rodents), large mammals (deer, cattle, horses), and birds. These, in turn, supply the predator population (man, coyotes, birds) with food. Many of these animals are highly dependent on certain habitat conditions to compete successfully. As changes in the plant community occur, the animal community is affected in both numbers and species. Such events affect the whole food chain interrelationship.

The net overall effect of retrogressive succession (which may be caused by improper grazing) is a change from a diverse, stable ecosystem with a variety of plants and animals to a simple, unstable ecosystem with few plant species and few animal species.

LANDSCAPE CHARACTER

Generally the horses are established in the upper elevations of the mountain ranges and are divided into six separate resident herd areas:

A. The Flanigan herd occupying a portion of the Honey Lake Valley and the north end of the Virginia Mountains.

B. Fort Sage Mountain

C. Granite Peak area, southeast of Fort Sage Mountain

D. Dogskin Mountain

E. Pah Rah Mountain range

F. Mahogany Flat (Tule Ridge) in the Virginia Mountain range

Honey Lake Valley, to the north of the area, consists of two raw, bright alkali flats that stand out in the midst of the surrounding brush-strewn valley floor. Brush covered slopes ascend into the rugged, rocky hills to the south and east. Some of the hills display terracing--the result of ancient Lake Lahontan's pounding on the low ridges. The hills rise abruptly and give way to the rugged heights of Fort Sage Mountain and the northern ridges of the Virginia Mountains. These semi-arid mountains are dotted with juniper and have a few springs, small meadows, and groves of cottonwoods and aspens.

Centrally located in the area is the low, hilly and brush covered Granite Peak region. Two ranges dominate the eastern portion of this area. Dogskin Mountain, spotted with juniper and rocky outcrops, rises suddenly and gives way to the loftier Tule Ridge portion of the Virginia Mountains to the east. Speckled with junipers, the high rocky cliffs of Tule Ridge rise abruptly from Winnemucca Valley. Lush meadows with aspen crown the higher reaches of the Virginia Mountains. Brilliant, multi-colored rocks of the "Incandescent Hills" brighten the southern end of the mountain range.

Lofty and seemingly remote, the rugged juniper-covered Pah Rah Mountain dominates the southern portion of the area. Imposing and rocky, the crescent-shaped range towers over sheltered Warm Springs Valley.

SOCIOCULTURAL INTERESTS

The Pyramid Planning Unit makes up the lower portion of Washoe County, excluding the Pyramid Lake Indian Reservation. Most of the county's

population is centered around Reno and Sparks, which are located in the southern end of the planning unit. There are 159,000 people in Washoe County, of which about 120,000 live in Reno and Sparks. This area is also the sociocultural center for the county. Outside the metropolitan area, the population density is rather low. Much of the land in Washoe County is used for sheep and cattle grazing. There are 26 active allotments (32 operators) in the Pyramid Planning Unit, four of which are for sheep and the remainder for cattle. Private and federally-owned lands are intermingled and the BLM grazing licenses are based on the use of both private and public lands. Ten of these allotments (15 cattle operations) contain bands of wild horses, for which no forage has been allocated by the BLM range adjudication. Consumption of cattle-allocated forage by the steadily increasing wild horses may have caused and may continue to cause an economic loss to the cattle operations due to the lower forage available for the cattle. However, no data are available on this.

Wild, free-roaming horses in the planning unit were declared to be "living symbols of the historic and pioneer spirit of the west" by Public Law 92-195, The Wild Horse and Burro Act. As such symbols, these horses have educational, scientific, and cultural values to the people of the region and nationally. Access taking about an hour's drive from the Reno area increases opportunities for observation and study of the horses. Local attitudes toward the presence of the horses, both generally and in the specific area, are varied. It should be noted that Reno is the headquarters of Wild Horse Organized Assistance, Inc. (WHOA!).

The following economic data are for all of Washoe County.

In 1969, livestock and livestock products sold in Washoe County accounted for 3.35% of total state livestock sales. In 1970, the agricultural industry accounted for minimal employment (1.22%) of Washoe County's population and was the second lowest employment sector for the county. Most of the county's employment is related to tourist-related services (24.32%), services (23.32%), and trade (17.49%). Of the total employment in agriculture for the state of Nevada, Washoe County accounts for 13.45%, and, of all employment in Nevada, agriculture in Washoe County accounts for 0.32% of the state's population (1).

The estimated personal income from livestock in Washoe County for 1972 was less than $0.1 million, compared to total earnings of $744 million for all income sources in the county and $2,777 million for the state (2).

Washoe County livestock operations depended on national resource lands for 18.1% of their forage in 1971. On a statewide basis, 23% of the livestock forage came from national resource lands in 1971. The 1972 estimated earnings of those dependent on public lands for grazing in Washoe County were less than $50,000 as compared to total county earnings of $744 million, and, on a statewide basis, $2,777 million (3).

It should be remembered the economic data are for all of Washoe County and the Pyramid Planning Unit occupies only the lower portion of the county.

References

(1) U.S. Bureau of the Census, Census of Population: 1970 General Population Characteristics.

(2) U.S. Bureau of the Census, Census of Agriculture, 1969, Vol. 1, Area Reports, Part 45, Nevada. (Data were projected to estimate the 1972 earnings.)

(3) U.S. Department of the Interior, Economic Profile for Bureau of Land Management in Nevada, Nevada State Office, June 1974, Appendix A, Table 19.

III. ANALYSIS OF THE PROPOSED ACTION AND ALTERNATIVES

Establish an intensive management area in the Flanigan Allotment. Maintain a population of 100 horses in the area. Remove all other horses from the federal range in the Pyramid Planning Unit.

A. Environmental Impacts of the Proposed Action

Construction of management facilities, both temporary and permanent, in the Pyramid Planning Unit.

Discrete Operations

(1) Trail and pipeline construction

(2) Trap and corral construction, both temporary and permanent

(3) Permanent fences

All discrete operations include limited travel by off-road vehicles (ORVs).

1. Anticipated Impacts

AIR

A temporary negligible impact is noted for trail and pipeline construction. This will be caused by the exhaust emission from the diesel grader.

Particulate matter will also be temporarily increased by the proposed trail construction.

LAND

A low negative impact on soil depth and structure is expected to result from the 3 miles of trail construction and 1/8 mile of pipeline installation. Localized impacts may be severe, but the overall adverse impacts will be low.

The impacts from trap and corral construction are expected to be negligible due to their localized nature. The trap may not be directly adjacent to an existing road and minimal trail development can be expected.

Fence construction (13.5 miles) will have a negative low impact on soil structure. District policy states that fence lines will not be cleared. However, it is assumed some ORV travel will occur along the fence line.

WATER

Water is limited throughout the planning unit. Within the proposed horse area there are 18 springs and two small creeks. The flow in these creeks, East and West Cottonwood Canyons, is extremely limited (possibly 0.2 CFS). The proposed construction of management facilities is expected to have no impact on water in the planning unit.

PLANTS (Aquatic and Terrestrial)

No impact on aquatic plants is anticipated due to their limited numbers in the planning unit.

Negative low impacts to terrestrial vegetation are expected from the trail and pipeline construction and the fence construction (13½ miles). The vegetation would be completely cleared from the proposed trails, creating a localized severe impact while on a unit-wide basis the impact would be low.

The fence line will not be cleared (district policy), yet ORV travel can be expected during construction. ORV travel may kill vegetation in the tire rows and may break down shrubs from the under carriage of the vehicle.

Trap and corral construction is expected to have a negligible impact on terrestrial vegetation. The impact may occur from the traps not being directly adjacent to an existing road, thus creating a minimal amount of ORV travel.

ANIMALS (Aquatic and Terrestrial)

No impact is anticipated to aquatic animals due to their extremely limited populations in the planning unit.

Negative low impacts to terrestrial animals are expected along the trail, pipeline, and fence construction primarily due to the loss of vegetation.

The fence, trail, and pipeline construction may destroy the entire habitat for some smaller mammals such as mice, while the effect on the larger mammals, such as deer and horses, would be negligible.

Trap and pipeline construction will have a possible negligible impact due to the ORV travel associated with their locations.

ECOLOGICAL INTERRELATIONSHIPS

Reference should be made to the previous discussion presented in living and non-living components of the environment (water, land, animals, etc.).

Succession will be the most pronounced of the ecological interrelationships to be disrupted by the proposed construction.

Fence, trail, and pipeline construction will create a localized disturbed site and succession will be altered allowing annuals (Halogenton, russian thistle and cheatgrass) to be introduced. The impact will be low for fence, trail, and pipeline construction and negligible for the trap and corral construction.

LANDSCAPE CHARACTER

The construction of the proposed facilities will have little or no impact on the landscape character in the planning unit. Due to the rugged terrain in the planning unit, most of the facilities, temporary and permanent, will be difficult to see even during the construction stage when men and equipment are at the proposed sites.

SOCIOCULTURAL INTERESTS

At this stage, the predominate interest by the public will be in the bidding for the construction contracts. Negligible interest will be generated by the proposed trap and trail construction. Considerable interest by certain sectors will be stimulated (positive low impact) by the fence contract estimated at over $17,000.

Gather approximately 300 horses in the Pyramid Planning Unit and return 75 wild horses to the federal range in the Flanigan Herd Area. Dispose of excess horses.

Discrete Operations

(1) Horse gathering

(2) Horse handling

(3) Decrease horse population on the range

1. Anticipated Impacts

AIR

No impact to the air from either the horse gathering or the decreased horse population can be expected.

A negligible impact from horse handling will be caused by exhaust emissions while trucking the animals to a holding and sorting area in Reno, Nevada. Vehicle exhaust emissions will be increased in the Reno area when claimed or adopted horses are picked up.

LAND

Gathering of the nearly 300 horses will have a negligible impact on the soil by creating trails (soil compaction and erosion) where the horses are herded into the wing traps. Soil disturbance and compaction from the horses can be expected in each of the traps and the holding and sorting areas. This impact would be extremely localized.

With a decrease in the horse population, a positive low impact can be expected to the land from less soil compaction in the wild horse areas throughout the planning unit.

No impact is expected to the land from horse handling.

WATER

No impact to water is expected from any of the discrete operations.

Decreasing the horse populations may increase available water for wildlife and livestock throughout the planning unit.

PLANTS (Aquatic and Terrestrial)

No impact is anticipated to the limited numbers of aquatic plants by any of the discrete operations in the planning unit.

Gathering the horses will have a negligible impact on terrestrial plants through trampling during the gathering process.

Horse handling will have no impact other than possible denuding of areas within the trap from browsing or trampling.

Decreasing the horse population will have a positive medium impact on terrestrial plants by reducing the competition for forage in the planning unit. At this time, no forage has been

allocated for horse use in the planning unit. This has resulted in over-utilization in some areas.

ANIMALS (Aquatic and Terrestrial)

No impact is expected to aquatic animals from the discrete operations due to their extremely limited populations in the planning unit.

The gathering process and handling of the horses will have no impact on terrestrial animals, except the horses.

The impact of the gathering and handling processes is expected to have a negative high impact on the horses. This is due to the traumatic effect of chasing and trapping, as well as sorting and trucking of the animals to Reno, Nevada.

Decreasing the horse population will have a high impact on the horses themselves. By removing a portion of the horse population in the Flanigan Herd Management Area, the competition for forage will be greatly reduced for the remaining horses (positive impact). However, the horses in the remainder of the planning unit will be removed from their habitat (negative impact). They will either be given to a foster home or destroyed humanely.

The reduction of the horse population in the Pyramid Planning Unit is expected to have a positive medium impact on the other terrestrial animals in the unit by reducing the competition for forage and water.

ECOLOGICAL INTERRELATIONSHIPS

There will be no impact from horse gathering or handling.

A decrease in the horse population will result in a positive medium impact on succession. By reducing the competition for forage, the more palatable climax species will be able to retain their vigor, thus allowing them to remain established in the horse areas. If the climax species are allowed to remain established, annual species (a lower seral stage) will not become established.

LANDSCAPE CHARACTER

The horse gathering and horse handling will have no impact on landscape character.

Decreasing the horse population will have a low impact (positive) on landscape character. By lowering the horse population, the competition for forage will be reduced and the grass and browse

species in the area will have a more natural growth form. However, by lowering the horse population, there will be fewer horses to view on the landscape (low negative impact).

SOCIOCULTURAL INTERESTS

The gathering of the horses is expected to create a high interest from the wild horse groups, persons who might contract for the job, and the range-users. These interests can be either negative or positive depending on the view point of the group involved.

A negative high impact is expected to the Fish Spring Ranch in which the Flanigan Wild Horse area is to be established. The reservation of 1200 AUMs for the horse management area will reduce this operation by 25%.

Decreasing the horse population will also create a high amount of interest and, again, the interest may be either positive or negative depending on the group involved. It is assumed that some of the public will be opposed to horse reductions while the range-users and others may favor their removal.

The horse handling is expected to have a positive high interest value for people wishing to see the animals while they are being sorted and held for disposal to private owners. A high negative impact is expected if an animal is injured during handling. This would upset most people.

Maintain the Flanigan Wild Horse Herd at 100 animals.

Discrete Operations

(1) Maintenance of facilities

(2) Disposal of excess animals

(3) Recreational use in the wild horse area

All discrete operations include limited ORV use.

1. Anticipated Impacts

AIR

No impact to the air is anticipated from the maintenance of facilities or disposal of the animals.

Exhaust emission from recreational vehicles may create a negligible impact.

LAND

All discrete operations during the maintenance of the herd will create a negligible impact on the land, primarily from

the limited ORV use with each discrete operation.

WATER

No impact is anticipated to water from either maintenance of the facilities or disposal of the animals.

A negligible impact to water is expected from recreational use, as a result of minor vandalism to water developments in the area.

PLANTS (Aquatic and Terrestrial)

No impact is expected to aquatic plants due to their extremely limited population in the herd area.

Maintenance of facilities (traps and fences) is expected to have a negligible impact on terrestrial vegetation. The impact may occur from the traps not being directly adjacent to an existing road, causing a minimal amount of ORV travel. This impact has previously been accounted for in the construction stage of implementation.

Recreational use is also expected to have a negligible impact due to the ORV travel in the wild horse herd area. However, the herd area is mostly steep, rugged terrain and does not lend itself to off-road vehicle use.

Disposal of the excess horses is expected to have a positive low impact on terrestrial vegetation, as a result of maintaining the proper utilization of the forage species.

ANIMALS (Aquatic and Terrestrial)

No impact is anticipated to aquatic animals due to their extremely limited population in the herd area.

A negligible impact on animals in the herd area is expected from the maintenance of facilities. This is primarily due to the loss of vegetation discussed earlier.

Disposal of the excess horses will have a positive low impact by reducing the competition for forage in the herd area.

A low negative impact is expected for all animals in the area from disturbance associated with recreational use.

ECOLOGICAL INTERRELATIONSHIPS

Maintenance of facilities and recreational ORV use in the herd area is anticipated to have a negligible impact on succession.

This impact has previously been discussed in the construction stage of implementation.

A positive low impact by reducing the competition for forage is expected from disposal of the excess horses. The more palatable climax species will remain in the area and fewer annuals (a lower seral stage) will become established.

LANDSCAPE CHARACTER

No impact is anticipated to the landscape character from the maintenance of facilities.

Recreational ORV use in the area is anticipated to have a negligible impact. As discussed earlier, the area does not lend itself to ORV use due to the rugged terrain.

Disposal of the excess horses will have a negligible impact on the landscape character, by reducing the over-grazed appearance in certain areas.

SOCIOCULTURAL INTERESTS

No interest will be created from the maintenance of facilities.

The number of animals to be disposed of at this stage of implementation will be small and the interest generally will be negligible.

Recreational use at this stage of implementation is anticipated to be moderate.

2. Possible Mitigating or Enhancing Measures to the Proposed Action

(a) Horse handling should be kept to a minimum. Capture and transportation is exceedingly traumatic to these animals. Minimizing the handling would increase the safety of the animals, as well as the handlers.

(b) During the period of April 1st to June 30th gathering can cause the abortion of foals or separation of the foal and mother. Gathering operations should be avoided during this period.

(c) During the gathering operation, the chance of injury to all horses involved is high. A veterinarian should be on call during the gathering operations.

(d) Off-road vehicle use should be held to a minimum, by constructing the permanent and temporary traps as close as possible to existing trails.

(e) After the initial gathering, permanent and temporary trap sites should be seeded. This would serve two purposes: (1) Prevent erosion; (2) Forage species would attract horses to the trap, making future capture easier.

(f) The Marl Holding and Sorting area should be seeded as these areas would receive a considerable amount of traffic during the sorting process and the transportation of animals to Reno, Nevada. Seeding would mitigate erosion problems.

(g) The proposed trail (3 miles) should be water-barred to prevent future erosion and maintenance problems on the trail.

(h) Contractors should be advised of all federal and state laws pertaining to the capture of wild horses.

(i) Prior to construction of proposed projects (either temporary or permanent) an archaeological survey would be done to prevent loss of cultural resources.

(j) A public participation plan is necessary to inform the public of the rationale of the proposed action and the long-term benefits.

(k) An interpretive program should be developed to inform the public of the wild horse management area.

3. Recommendations for Mitigation or Enhancement of the Proposed Action

(a) Horse handling will be kept to the minimum practical.

(b) No gathering of horses will be allowed from April 1st through June 30th.

(c) A veterinarian will be on call during the gathering operation.

(d) Off-road vehicle use will be kept to a minimum.

(e) After the roundup is completed, permanent and temporary trap sites will be seeded.

(f) After the roundup, the Marl Holding and Sorting area will be seeded.

(g) Trails developed for the gathering operation will be water-barred.

(h) All project sites will have a cultural resource inventory prior to construction.

(i) A public participation plan will be prepared and executed.

(j) An interpretive program (signs, literature, etc.) will be developed for the Flanigan Wild Horse Management Area.

4. Residual Impacts of the Proposed Action

Trails will be developed from off-road vehicles associated with maintenance of facilities and recreational use.

Injury and death of some horses can be expected.

Horse handlers may experience injuries.

Recreational use in the area may lead to vandalism of existing water developments and permanent structures developed to accomplish the proposed action.

5. Relationships Between Long-term Use and Short-term Productivity

The reservation of forage for 100 wild horses (1200 AUMs) will reduce the Fish Springs Ranch operation by 25%. This, in turn, will reduce by 25% the number of calves sent to market by this ranch.

Removal of all horses in the rest of the Pyramid Planning Unit will reduce competition for forage and increase plant vigor and productivity.

6. Irreversible and Irretrievable Commitments of Resources

There will be no irreversible or irretrievable commitment of resources by the proposed action.

Alternative 1

No action.

B. Environmental Impacts of Alternative 1

1. Anticipated Impacts

AIR

This alternative would have no effect on the air.

LAND

The combined use by livestock and wild horses is anticipated to have a negative low effect on soil structure. Year-round use in some areas such as meadows is concentrated, which will have an adverse effect on soil structure.

WATER

Alternative 1 will have no effect on water in the planning unit. However, the combined needs of livestock and wild horses may create competition for water during drier months.

PLANTS (Aquatic and Terrestrial)

No impact on the limited aquatic vegetation is anticipated.

A moderately negative impact is anticipated to terrestrial vegetation if no action is taken. No forage has been allocated for horse use in this planning unit. Within the planning unit, all available forage is totally allocated to livestock. Any use above this is detrimental to the forage species. With continued inaction, the damage to the forage resource will become more severe.

ANIMALS (Aquatic and Terrestrial)

No impact on aquatic animals is anticipated due to their extremely limited nature in the planning unit.

No action is expected to cause a negative moderate impact on other animals in the planning unit, because no forage has been allocated for wild horses (see Plants above). Competition for forage among all animals would be continued. This competition would be significantly increased as the horse population expands (15-20% per year).

ECOLOGICAL PROCESSES

A negative moderate impact is expected on succession if no action is taken. The combined use by horses and livestock will have an adverse effect on the dominant, desirable forage species. Continued over-utilization of these species will cause them to die out and succession will be set back to a lower seral stage with undesirable forage species.

LANDSCAPE CHARACTER

No action may have a low impact (no sign).

It will allow continued growth of the horse population, making the horses more visible on the landscape. This can be considered as a positive low impact.

Continued growth of the horse herds and continued competition for forage will create an overgrazed appearance to the vegetation. This could be considered a negative low impact.

SOCIOCULTURAL INTERESTS

No action will create a negative moderate impact. Livestock

interests prefer to have the horses removed rather than having the populations continue to increase.

Wild horse interests are now realizing that overpopulation is detrimental to both the horses and the habitat.

2. Possible Mitigating or Enhancing Measures

Under this alternative, no mitigating or enhancing measures are possible.

3. Recommendations for Mitigation or Enhancement

No action requires that no mitigating or enhancing measures be taken.

4. Residual Impacts

Residual impacts are those impacts remaining after the mitigating and enhancing measures are followed. With no action, no mitigating or enhancing measures will be taken and the impacts will be those discussed under Anticipated Impacts.

5. Relationship Between Short-term Use and Long-term Productivity

Inaction at the present time will not damage the long-term productivity of areas where smaller herds are found. Continued inaction with the anticipated increase in herds will result in losses of the forage resource.

In the areas with larger herds (Pah Rah and Flanigan), continued inaction will result in a greatly reduced forage resource and lowered long-term productivity.

6. Irreversible and Irretrievable Commitments of Resources

If no action results in over-utilization of the range to the point of extreme soil erosion, this could be considered an irretrievable commitment of the resource. Soil development is extremely slow in the cold desert biome.

Alternative 2

Attain the proper stocking rate in the Pyramid Planning Unit while maintaining the horse population at the 1971 level by making required adjustments in livestock.

Discrete Operations

(1) Construction of temporary facilities within the six herd areas in the planning unit. The temporary facilities would include traps, corrals, water tanks and troughs.

(2) Gather approximately 119 horses, lowering the population to 175 animals, the estimated 1971 level.

(3) Horse handling. This discrete operation involves moving the horses from the trap and corral sites to Reno, Nevada as well as sorting the animals for adoption.

(4) Decreased horse population (effect of having approximately 119 fewer horses of the federal range).

(5) Reduced livestock use (effect of having less livestock use to attain the proper stocking rate in the herd areas).

C. Environmental Impacts of Alternative 2

1. Anticipated Impacts

AIR

Of the five discrete operations only horse handling is expected to have any impact on the air. Exhaust emissions from trucking of the animals to Reno, Nevada and persons coming to pick up their adopted animals will create a negligible impact.

LAND

The discrete operations involving the construction of temporary facilities and the gathering of the horses are expected to have a negligible effect on soil structure. This impact may be caused by limited off-road vehicle use.

Gathering of the horses is anticipated to have a negligible impact on soils structure by creating trails where the horses are herded. The areas within the proposed temporary traps may become compacted by animals in the trap.

Horse handling is expected to have no impact on soil structure. A decrease in both the livestock and horse population is anticipated to have a positive low impact on soil structure throughout the planning unit. Both horses and livestock tend to concentrate in areas, such as meadows, causing some soil compaction.

WATER

No impact is expected to water in the planning unit from any of the discrete operations. However, the reduced populations of both livestock and horses may alleviate some pressure on water during drier months.

PLANTS (Aquatic and Terrestrial)

No impact is expected to aquatic plants by any of the discrete operations of this action.

A negligible impact is expected to terrestrial vegetation from the construction of temporary facilities and the actual gathering of the horses. A limited amount of off-road vehicle travel will damage plants, and a negligible amount of trampling can be expected during the horse gathering.

Horse handling will have no effect on terrestrial plants. The reduction of livestock and horses is expected to have a positive moderate impact. The reduced livestock and horse populations will attain the proper stocking rate and lower the utilization of the preferred plant species in the herd areas.

ANIMALS (Aquatic and Terrestrial)

No impact is expected from any of the discrete operations to aquatic animals due to their extremely limited populations.

The construction of temporary facilities will have a negligible effect on horses and other animals. The effects will primarily be loss of habitat for some smaller animals such as mice. The traps may be situated in the vicinity of water, which would cause some disturbance to the horses.

No impact is expected to other animal species from either the horse gathering or horse handling. However, these discrete operations are expected to have a negative high impact on the horses, from the traumatic effects of gathering and sorting in the corrals.

A decreased horse population will have positive moderate impact on other animals by lowering the competition for forage. A high impact is expected to the horses by their reduced numbers. This operation will reduce competition for forage (positive impact) while a number of horses will have to be adopted (positive impact) or destroyed (negative impact).

The reduction in livestock will have a positive moderate impact on other animals, including the horses, through the reduction in competition for forage within the herd areas.

ECOLOGICAL INTERRELATIONSHIPS

Succession will be disrupted by this alternative. Construction of temporary facilities and some off-road vehicle use (negligible impact) will create small, disturbed sites. Once the disturbance has occurred, the sites would be invaded by annuals, such as russian thistle and cheatgrass.

The discrete operations of horse handling and gathering are anticipated to have no effect on ecological interrelationships.

The lowering of both the horse and livestock numbers to attain the proper stocking rate will have positive moderate impacts. Competition for forage will be decreased, allowing the dominant palatable species to maintain themselves within the herd areas.

LANDSCAPE CHARACTER

Landscape character will be unaffected by the construction of temporary facilities, gathering of horses, or the horse handling.

The reduction in livestock and horses will have a low impact. Fewer livestock and horses on the open range may be considered either positive or negative depending on the point of view of the person viewing the landscape.

SOCIOCULTURAL INTERESTS

Construction of the temporary facilities will have a negligible impact.

There is not much interest generated or monetary gain associated with this discrete operation.

Gathering of the horses is expected to create moderate interest. A contract will be let to gather the animals, which will generate interest from potential bidders (positive impact). The gathering operation will create interest from the wild horse groups and livestockmen. In general, the livestockmen will be in favor of the removal of horses, while the wild horse interests may be opposed.

The reduction in livestock will also create moderate interest. The wild horse interests will be in favor of the livestock reduction, while the livestockmen will be opposed.

Within the herd areas there will be a reservation of 2028 AUMs to maintain 169 horses (1971 estimated population for the planning unit, see Table 4). This will pose a monetary loss for the range-users involved.

The Pah Rah Herd presents a particular problem. With the reduction of the horses to the 1971 level, there are not enough federal AUMs to support the remaining animals in the Cottonwood Creek Allotment. The remaining allotments used by the Pah Rah herd (see Table 2) are all alternating sections of private and federal land. It is impossible to maintain this herd solely on federal land.

2. Possible Mitigating or Enhancing Measures

(a) Horse handling should be kept to a minimum. Capture and transportation will be exceedingly traumatic to these

animals. Minimizing the handling will increase the safety of the animals, as well as the handlers.

(b) During the period of April 1st to June 30th gathering can cause the abortion of foals or separation of foal and mother . Gathering operations should be avoided during this period.

(c) During the gathering operation the chance of injury to horses is high. A veterinarian should be on call during the gathering operations.

(d) Off-road vehicle use should be held to a minimum. This can be accomplished through constructing the temporary facilities as close as possible to existing trails.

(e) Prior to construction of temporary facilities, an archaeological survey should be done to prevent loss of cultural resources.

(f) Temporary facilities' sites should be seeded after completion of the action. This will prevent erosion and invasion of annual plant species.

3. Recommendations for Mitigation or Enhancement

(a) Horse handling will be kept to the minimum practical.

(b) No gathering of horses will be allowed from April 1st through June 30th.

(c) A veterinarian will be on call during the gathering operation.

(d) Off-road vehicle use will be kept to a minimum.

(e) After the roundup is completed temporary facility sites will be seeded.

(f) All project sites will have a cultural resource inventory prior to construction.

(g) A public participation plan will be prepared and executed.

4. Residual Impacts

Trails will be developed from off-road vehicle use associated with the traps.

Some injury and death losses can be expected to the horses.

Some injury may be expected to the horse handlers.

5. Relationship Between Short-term Use and Long-term Productivity

The reservation of forage for 169 horses (2028 AUMs) will reduce the productivity for the livestock operations involved (see Table 4).

Attaining the proper stocking rate in the herd areas will maintain the productivity of the federal range.

6. Irreversible and Irretrievable Commitments of Resources

There will be no irreversible or irretrievable commitments of resources with this action.

Alternative #3

Attain the proper stocking rate in the Pyramid Planning Unit by equally reducing livestock and wild horses, after the horses are reduced to their 1971 level.

Discrete Operations

(a) Construction of temporary facilities

(b) Horse gathering

(c) Horse handling

(d) Decreased horse numbers

(e) Decreased livestock numbers

All discrete operations include limited travel by off-road vehicles.

C. Environmental Impacts of Alternative 3

1. Anticipated Impacts

AIR

Little or no impact to the air will result. Vehicles will be used in construction of temporary facilities, horse handling and gathering, but the impact will be negligible.

LAND

Little or no impact to the land will result from construction of facilities, horse gathering, and horse handling. The decreased horse population will have a positive low impact by less soil compaction. The impact of reduced livestock will be slightly less since fewer animals are involved.

WATER

No impact to water is expected from any of the discrete operations. Decreasing the horse and livestock numbers may increase available water for the remaining animal life.

PLANTS (Aquatic and Terrestrial)

No impact is anticipated to the limited aquatic plants by any of the discrete operations.

Little or no impact will result to terrestrial plants from construction of facilities, horse handling, and horse gathering. Decreasing the horse numbers will have a positive medium impact by eliminating over-grazing. Decreasing the livestock will have a positive low impact for the same reason.

ANIMALS (Aquatic and Terrestrial)

No impact is anticipated to the limited populations of aquatic animals by any of the discrete operations.

Little or no impact will result from construction of facilities, horse handling and gathering to terrestrial animals except the horses. The impact of the gathering and handling will have a negative high impact on the horses, due to the traumatic effect of being chased, corralled, sorted, loaded into trucks, and transported to the disposal area. Here they will be sorted again and trucked to their new homes, or, if not adopted, destroyed in the most humane manner possible.

Decreasing the horse population will have both a positive and negative high impact on the horses themselves. Reduction of numbers will reduce the competition for forage among the remaining horses (positive impact). The ones removed will be eliminated from their habitat, loaded into trucks, and transported to the disposal area, etc. (negative impact).

Decreasing the horse population in small herd areas could possibly cause the demise of the entire herd. Table 6 shows the horses remaining in each herd using this alternative. Fort Sage, Dogskin, Granite Peak, and Mahogany Flat would have only 3 head left. This herd size is probably not viable. Death of one or two members of the herd could easily happen and the herd would be eliminated.

Other terrestrial animals will benefit from the decrease in both livestock and horses, as competition for forage and water would be reduced.

The reduction in livestock is beneficial to the horses because both types of animals would share in reductions, not just horses.

ECOLOGICAL INTERRELATIONSHIPS

There will be little or no impact from construction of facilities, horse handling and gathering.

A decrease in the horse and livestock populations will result in a beneficial impact on succession. That impact is greatest with the horses because more of them are being removed. Excess numbers are causing a regression of vegetative succession in areas where the animals concentrate. The more palatable species are being eliminated and replaced by less palatable species.

LANDSCAPE CHARACTER

There will be no impact from construction of facilities, horse handling and gathering.

A decrease in the horse and livestock populations will have both a positive and negative low impact. Reducing their numbers will reduce the use of vegetation for forage and allow it to be viewed in a more natural growth form (low positive impact). However, there will be fewer animals to view on the landscape (low negative impact).

SOCIOCULTURAL INTERESTS

There will be no impact from construction of facilities.

The gathering of the horses will create interest to many people. A contract for the gathering will be awarded and provide jobs. Wild horse groups will be watching closely to see if the animals are treated humanely. National interest could build up if publicity is extensive. Range-users generally lend positive support to the gathering of the horses.

The horse handling will have a positive high interest value for people wishing to see wild horses in corrals and being handled. As stories spread throughout the country about the animals being corralled and held for adoption, national interest is generated. High negative impacts are expected as a result of an injury or death due to handling.

Reducing the horse population will also create a high amount of interest. Some of the public will be opposed to horse reductions, while the livestock interests will be in favor of it.

Reducing the livestock numbers will create a high amount of interest (negative) among the livestock people and, in particular, those range-users directly affected by reductions.

2. Possible Mitigating or Enhancing Measures

a. Horse handling should be kept to a minimum. Capture and transportation will be exceedingly traumatic to these animals. Minimizing the handling will increase the safety of the animals as well as the handlers.

b. During the period of April 1st to June 30th gathering can cause the abortion of foals or separation of foal and mother . Gathering operations should be avoided during this period.

c. During the gathering operation the chance of injury to all horses involved is high. A veterinarian should be on call during the gathering operations.

d. Off-road vehicle use should be held to a minimum. This can be accomplished through constructing the temporary facilities as close as possible to existing trails.

e. Prior to construction of temporary facilities, an archaeological survey should be done to prevent loss of cultural resources.

Temporary facilities' sites should be seeded after completion of the action. This will prevent erosion and invasion of annuals.

3. Recommendations for Mitigation or Enhancement

a. Horse handling will be kept to the minimum practical.

b. No gathering of horses will be allowed from April 1st through June 30th.

c. A veterinarian will be on call during the gathering operation.

d. Off-road vehicle use will be kept to a minimum.

e. After the roundup is completed, temporary facility sites will be seeded.

f. All project sites will have a cultural resource inventory prior to construction.

g. A public participation plan will be prepared and executed.

4. Residual Impacts

The removal of the horses and livestock cannot be avoided. The impact to the horses can only be minimized as noted above. The net effect to the rangeland ecosystem is positive when proper stocking rate is attained by removing excess animals.

5. Relationship Between Short-term Use and Long-term Productivity

This alternative is designed to attain the proper stocking rate which will maintain or improve the long-term productivity.

6. Irreversible and Irretrievable Commitments of Resources

There are no irreversible or irretrievable commitments of resources under this alternative.

Alternative 4

Attain the proper stocking rate by removing all horses from the federal range in the Pyramid Planning Unit. No livestock reductions would be made.

Discrete Operations

(1) Use of temporary trap and corral facilities.

(2) Gathering of wild horses into the corrals.

(3) Handling of the horses including sorting, inspection, transporting to a holding corral (possibly in Reno), and relocation to their final destination.

(4) Complete removal of horses from the planning unit, including adoption or destruction. Relocation to other horse ranges is not being considered because the entire district's planning has not been completed.

D. Environmental Impacts of Alternative 4

1. Anticipated Impacts

AIR

No impact on air quality is anticipated except during the horse handling operations. At that time, negligible exhaust emissions could be expected from the vehicles removing the horses to a centrally-located (Reno, for example) holding and processing corral.

LAND

A negligible impact in the form of slight soil compaction could occur during the transporting and placing of trap and corral facilities. Additional soil compaction would occur within the trapping areas when the horses are gathered. As the horses would be taken to a central holding corral, the time spent in the temporary trapping facilities would be limited. Overall benefits to the soils in the planning unit would result as the absence of horses would eliminate further soil compaction.

WATER

Because water in the planning unit is so limited, no impacts would be anticipated from horse removal activities.

PLANTS (Aquatic and Terrestrial)

Aquatic plants are extremely limited and no impacts would be expected by horse removal activities.

Negligible impacts on terrestrial vegetation could occur from the temporary facilities and the gathering operation. Vegetation in the trapping area could be trampled during horse capture and removal to the holding corral. Horse handling activity in the holding corral would not impact vegetation, as the corral would most likely be in Reno. A moderate improvement in planning unit vegetation would be expected by removing the horses. Over-grazing would be eliminated.

ANIMALS (Aquatic and Terrestrial)

There are very few aquatic animal populations due to the nature of the planning unit water sources. No impacts on the limited populations would result from horse removal.

Placement of temporary facilities may have a negligible disruptive influence to the smaller, terrestrial animals such as rodents. Livestock would have a moderately improved situation by horse removal, as competition for forage would be eliminated.

The planning unit's horse population would be heavily impacted by this proposal. Transporting and placing the temporary traps would disturb nearby horses. The major impacts would occur during gathering and handling. Such activities could be highly disruptive and frightening to the wild horses. Attempts to escape could result in injuries and/or death to highly excited horses.

Attempts would be made to find custodians for all animals captured. Should some of the animals not be adopted, the alternative disposal method would be destruction. This could be viewed as a highly negative impact for those animals.

ECOLOGICAL INTERRELATIONSHIPS

Succession would be altered by horse removal. A negligible impact would be expected from trap facilities. Slight soil compaction and vegetation trampling would change the normal sequence of succession in localized areas. A moderate improvement in successional change would result from horse removal. Use of more desirable forage plants would be at the proper rate and less invasion of annuals and unpalatable species would result. Remaining animals would have more food and future access to the better forage plants. A more stabilized plant-animal relationship would result.

LANDSCAPE CHARACTER

No impact would be made on the landscape character from horse removal. Lack of opportunity to see wild horses running on the open range could be viewed negatively by some. Horses would remain in other locations within the District, but they would be at greater distances from Reno and Sparks.

SOCIOCULTURAL INTERESTS

Such a horse reduction near a populated area would arouse considerable interest and have high impacts. The contracts for horse round-up and purchase of trap facilities would be economically beneficial to the individuals or companies involved. This positive impact would be limited to a few persons, however.

Past gatherings of horses have been widely publicized and concern for the operations touched most areas of the United States. The possibility of injury and death for the horses during round-up would be of considerable concern to wild horse interests. All aspects of the operation, including the justification for horse removal, would be closely scrutinized by BLM public.

Holding corrals located in Reno would add further stimulus to local, regional, and, perhaps, national interest. The opportunity to view wild horses at such close quarters would appeal to many.

Costs of maintaining the animals until all potential custodial applications were processed could be considerable. The manpower involved in soliciting and screening applications would be paid by taxpayers.

If horses were destroyed because custodians weren't found, the emotional impacts would be quite high. Since there are almost 300 horses involved, the likelihood of all being adopted is not great.

Range-users whose allotments had wild horses would view the horse removal as generally favorable. Their cattle would no longer be forced to compete for forage allocated to them.

Removal of all horses would preclude any studies of their requirements or habits. Knowing that the horses were no longer in the planning unit could negatively affect many people who enjoy the idea of free-roaming animals. Others, having expressed disdain for wild horses, would probably welcome such removals.

2. Possible Mitigating or Enhancing Measures

a. Off-road vehicle traffic should be minimal. Every attempt to locate trap and corral facilities by existing roads should be made.

b. Horse handling should be kept to a minimum to reduce possible death or injury to the horses and handlers.

c. During the period of April 1st to June 30th, gathering can cause the abortion of foals or separations of the foals and mothers. Gathering operations should be avoided during that period.

d. Prior to construction of temporary facilities, an archaeological survey should be done to prevent loss of cultural resources.

e. Thorough investigation of the contract applicants should be made to insure competent handlers are hired. All work should be supervised by knowledgeable BLM employees.

f. All phases of the operation should be closely coordinated with special interest groups to avoid misunderstanding. News releases should correctly explain the needs, methods, and anticipated results of the operation.

g. Any destruction of animals should be adequately explained to news media and interest groups. Concerted efforts to find adoptive homes for the captured animals should be made. However, excessive costs through prolonged holding of animals must be avoided where possible.

3. Recommendations for Mitigation or Enhancement

All of the measures described above should be applied if this proposal is executed.

4. Residual Impacts

The complete removal of horses without any livestock adjustments would find considerable opposition among certain interest groups. Widespread, probably negative, publicity should be anticipated as a result.

Some injury and possible deaths to the horses during gathering and handling is likely. Horse handlers could receive injuries as well.

Intense emotions over destruction of excess animals could be expected. Widespread, probably negative, publicity should be anticipated.

5. Relationship Between Short-term Use and Long-term Productivity

Continued use by both horses and cattle will lead to degradation of the areas particularly those of the Flanigan and Pah Rah herds. Over-grazing will lead to range deterioration including loss of forage, erosion problems, and other ecological imbalances.

Removal of horses would bring the grazing use into accord with available forage and range plants could maintain their vigor.

Long-term gains in range condition could be expected.

If additional forage became available through intensive management, horses from other areas in the district could be relocated to this area.

6. Irreversible and Irretrievable Commitments of Resources

No resource values would be irretrievably committed by this proposal.

Alternative 5

Attain the proper stocking rate by continually reducing livestock. No horse reductions would be made in the affected allotments until the proper stocking rate is reached by horses.

Discrete Operations

(1) Reduction of livestock as wild horse population increases; maintain proper stocking rate during transition period.

(2) Upon termination of livestock grazing in the affected allotments, maintain the horses at the proper stocking rate.

(3) Remove excess horses periodically to maintain the proper stocking rate.

E. Environmental Impacts of Alternative 5

1. Anticipated Impacts

AIR

No impact on air quality is anticipated except during times when stock adjustments are being made. At these times, negligible exhaust emissions could be expected from the vehicles removing livestock or excess horses.

LAND

A negligible impact in the form of slight soil compaction can be expected from vehicles and facilities necessary for the livestock reductions and later horse reductions.

WATER

Because water is limited within the area, no impacts are anticipated by changing the primary use from livestock to horses.

PLANTS (Aquatic and Terrestrial)

Aquatic plants are quite limited and no impacts are expected by conversion from livestock and horse grazing to horse grazing.

A moderate improvement in some areas' vegetation could be expected by elimination of livestock grazing and accomplishment of the proper stocking rate is attained, periodic removal of excess horses will be necessary to maintain the stocking rate and prevent deterioration of vegetation.

ANIMALS (Aquatic and Terrestrial)

There are very few aquatic animal populations in the area because of limited water. No impacts are anticipated through the reduction in livestock and resultant increase in horse numbers.

Livestock will be heavily impacted by this alternative as their numbers will be reduced as horse numbers increase. Eventually all livestock grazing will be eliminated in favor of horses.

This alternative would be highly beneficial to the horses; they would be allowed to increase at their natural rate until they

reach the proper stocking rate. At that time, excess horses would be removed periodically to maintain the proper stocking rate.

It is felt that the horse reductions necessary to maintain the proper stocking rate can be accomplished with little or no negative effect on the herds. Old, sick or injured animals could be removed to maintain herd health and vigor as well as desired herd size.

ECOLOGICAL INTERRELATIONSHIPS

Succession would be slightly altered by the gradual transition from livestock grazing to horse grazing. Once horse populations have reached the proper stocking rate and livestock grazing is eliminated, there would be little or no effect on the successional patterns. Use of more desirable forage plants would be at the proper rate and less invasion of annuals and unpalatable species would result. Remaining animals would have more food and access to better forage. A stabilized plant-animal relationship would result by the controlled management of horses.

LANDSCAPE CHARACTER

The impact of removal of livestock from the area will be low. The opportunities for observing wild horses will increase as the herds expand. This will have a moderate impact on the public, because of the herds' close proximity to the population centers of Reno and Sparks.

SOCIOCULTURAL INTERESTS

The proposed reduction and eventual elimination of livestock grazing from this area is going to have a high impact. Several livestock operations in the area are dependent on the use of federal range for their existence. A gradual reduction in livestock grazing and its eventual termination on the federal ranges in the planning unit will force these operators to relocate to other federal ranges, utilize private sources of forage, or terminate their livestock operations. It should be assumed that none of these options would be popular with the livestock operators and would no doubt be contested. Although this process would be spread over several years, an economic impact on the local merchants involved in the livestock industry would surely be felt.

The maintenance of large numbers of wild horses on national resource lands adjacent to Reno and Sparks will have a high local impact because of their high degree of visibility and proximity to population centers, plus the concerns of the wild horse protection movement which has its roots in this area.

Tourists and other interested parties can be expected to visit and utilize the area because of the increased horse populations.

After livestock grazing has been eliminated and the horses have attained the proper stocking rate through natural increases, the need to periodically remove excess horses will become necessary, in order to maintain the proper stocking rate. Such round-ups of wild horses have in the past received much emotional publicity, both pro and con, concerning the round-up. It should be anticipated that future round-ups will continue to receive such attention.

2. Possible Mitigating or Enhancing Measures

Close cooperation should be maintained between the affected livestock operators and the BLM in an effort to relocate the displaced livestock in a manner acceptable to all concerned parties.

Local governmental agencies, elected officials, interested groups and individuals should be kept informed about all steps being taken to implement this alternative.

The news media will be kept informed concerning all steps being taken to implement this alternative.

All phases of the operations concerning the removal of excess horses will be coordinated with all interested parties to insure the horses' safety and welfare during all phases of their capture, holding and eventual disposition.

3. Recommendations for Mitigation or Enhancement

All of the measures described above should be applied if this proposal is executed.

4. Residual Impacts

The complete phasing-out of livestock grazing in favor of wild horse use on these national resource lands will receive considerable opposition from the operators, livestock interests, elected officials and others. Widespread publicity against the BLM and this proposal should be expected.

Some favorable backing should be expected from the wild horse interest groups and others.

Over all, the alternative is certain to generate considerable emotion and comments from those that oppose and those that support this alternative.

5. Relationship Between Short-term use and Long-term Productivity

Little effect will be immediately seen if this alternative is adopted. With the passage of time, the horse population will increase and livestock numbers will be reduced until such time that all livestock have been removed and replaced by wild horses at the proper stocking rate.

The effect will be a gradual reduction and eventual elimination of beef production from these national resource lands.

6. Irreversible and Irretrievable Commitment of Resources

No resource values would be irretrievably committed by this alternative.

IV. PERSONS, GROUPS, AND OTHER AGENCIES CONSULTED

Velma Johnston, Wild Horse Organized Assistance, Inc., Reno.
Dawn Lappin, Wild Horse Organized Assistance, Inc., Reno.

Earl Batteate, Flanigan Allotment
Warren Westbrook, Antelope Mountain Allotment
Marshall Matley, Antelope Mountain Allotment
Larry Pedrett, Antelope Mountain Allotment
Joe Capurro, Big Canyon Allotment

Charles Fisher, Bureau of Indian Affairs (Pyramid Lake Indian Reservation)
Bureau of Land Management - Nevada State Office
" " " - Grand Junction District Office
" " " - Susanville District Office
" " " - Tonopah Resource Area

Tom Ballew, State Brands Inspector, Nevada Department of Agriculture
Terry Retterer, Nevada Department of Fish and Game
George Tsukamoto, Nevada Department of Fish and Game
Sam Millazzo, Nevada Department of Fish and Game

V. INTENSITY OF PUBLIC INTEREST

National, as well as local, attention to the range conditions on the national resource lands has been most recently stimulated by two BLM actions taken this year. These were the increase in grazing fees and the two-month-a-year grazing restriction. In Nevada, particularly, the reaction to these actions has been very negative by the livestock interests and Nevada congressmen. Included in their counter-demands to BLM were expressions of concern regarding the impact wild horses were having on the range.

As the second major Nevada round-up and removal of horses after Stone Cabin Valley, the potential for national attention to the proposed Pyramid Planning Unit herd reductions does exist.

Wild horse interests are also concerned by the range conditions and are interested in assuring that forage is allocated to sustain wild horse populations. Representatives of the varied wild horse groups may be expected to follow closely any herd reductions. Their concern is that livestock should also be reduced if demand exceeds the capacity of an area.

Inquiries for "adoption" of wild horses continue to be received and past interest in this program involved citizens of almost every state.

Conservationists and their interest groups also closely watch BLM activities. Of particular concern to them is the management of the national resource lands so that resource values are not lost.

The management framework plan for the Pyramid Planning Unit was completed in November 1974. Discussion of the wild horse situation was included in all public meetings and workshops. Of the thirteen written replies to our public discussions, twelve favored:

1. restriction of wild horses to their present geographical areas;
2. development of a horse management plan; and
3. removal of all horses claimed and/or branded and forage allocations made for wild horses.

In summary, all interests identified are concerned about range conditions. Solutions to improve the range or at least partially satisfy grazing demands bring out differences of opinions. The livestock and wild horse interests want to assure that adequate consideration is given to the needs of the cattle and horses when any adjustments are made. The emotional impacts of horse removal, and their possible destruction, and cattle reductions will play a role in public reactions to the proposals.

VI. PARTICIPATING STAFF

Pardee P. Bardwell, Wildlife Biologist, Lahontan Resource Area
Joan Comanor, Writer/Editor
Edward Mayo, District Range Specialist
Bill Garrels, District Recreation Planner

VII. SUMMARY CONCLUSION

Within the Pyramid Planning Unit there are 6 horse herds, 2 of which include over 100 animals each. The remaining 4 herds have under 20 animals each (see Tables 2 and 3). The 1975 aerial inventory showed 294 horses in the planning unit.

The Flanigan Wild Horse Herd Management Area Plan has been prepared. The Environmental Analysis Record is an assessment of that plan and the Management Framework Plan, Step III decision for wild horses.

The proposed action would remove five of the herds while maintaining 100 animals on the summer range of the Flanigan Grazing Allotment. The intensive management area would have dual use by livestock and wild horses. A reservation of 1200 AUMs would be made for wild horses, while a reduction in the same amount would be made in livestock use.

At this time the horse population (294 animals) is having a moderate impact on the forage resource, because no forage has been allocated for horses in the planning unit. If the present use continues (no action, Alternative 1), the damage may become significant.

Alternatives 2, 3, and 5 all suggest livestock reductions in the 10 affected allotments to maintain varying populations of wild horses in the 6 herd areas. These alternatives protect the forage resource but do not alleviate the problems stated in the Management Framework Step III Decision (see introduction). These alternatives would also require managing six wild horse herds while protecting the forage resource, as opposed to one herd in the proposed action. Removing all horses (Alternative 4) contradicts the MFP decision.

Special attention should be paid to the Pah Rah Herd (119 animals). The allotments where this herd ranges are all alternating sections of private and national resource lands and it is, therefore, impossible to maintain this herd on national resource lands.

The highest impact (negative) of the proposed action and alternatives is the effect of gathering on the horses.

It is recommended that the proposed action be taken with the following stipulations:

a. Horse handling will be kept to the minimum practical.

b. No gathering of horses will be allowed from April 1st through June 30th.

c. A veterinarian will be on call during the gathering operation.

d. Off-road vehicle use will be kept to a minimum.

e. After the round-up is completed, permanent and temporary trap sites will be seeded.

f. After the round-up, the Marl Holding and Sorting Area will be seeded.

g. Trails developed for the gathering operation will be water-barred.

h. All project sites will have a cultural resource inventory prior to construction.

i. A public participation plan will be prepared and executed.

j. An interpretive program (signs, literature, etc.) will be developed for the Flanigan Wild Horse Management Area.

VIII. SIGNATURES

Prepared by: Pardee Bardwell, Wildlife Biologist, Lahontan R. A.
Joan Comanor, Writer/Editor
Eddie Mayo, District Range Specialist
Bill Garrels, District Recreation Planner

Concurred by: Norman L Murray — 4-16-76
Norman L. Murray — Date
Area Manager, Lahontan R. A.

Approved by: Donald G Pomi — 4-16-76
L. Paul Applegate, District Manager — Date
Carson City District acting

E. I. Rowland — Date
State Director, Nevada

Table 1. Permanent facilities required to manage the Flanigan Wild Horse Management Area.

Facilities and their locations	Units
Water Trap - Adobe Spring	1/ea.
Wing Trap - East Virginia Peak	1/ea.
Wing Trap - East Cottonwood Canyon	1/ea.
Trail Construction - Access to Adobe Water Trap and East Virginia Wing Trap	3 miles
Fence Construction - East and West Boundaries	13½ miles
Marl Holding and Sorting Corral	1/ea.
Pipeline - From existing trough to Marl Holding area	1/8 mile

Table 2. Estimated Horse Use by Allotment

Herd Name	Allotment	AUMs Class I	Horse Numbers	Est. Horse Use/Allot./ Herd (percent)	Horse AUMs
Flanigan	Flanigan	5062[1]	130	100	1560
Fort Sage	Flanigan	5062	3	12.5[3]	36
	Winnemucca	6942	5	25[3]	60
	Constantia[2]	245	3	12.5[3]	36
Dogskin	Paiute Cyn.	4034	9	100	108
Granite Peak	Antelope Mtn.	8447	10	100	120
Pah Rah	Cottonwood Cr. &private land[4]	202	83	70	996
	Olinghouse Cyn.	1113	12	10	144
	White Hills	1123	12	10	144
	Mustang	300	12	10	144
Mahogany Flat	Hardscrabble Cyn.	1236	5"	100	60
		28704	284		3408
			10 Calif.[3]		
			294		

28704
3408
25296

[1] Active Use

[2] AUMs within Nevada

[3] Assume 50% of use in California - Susanville District

[4] 4,020 Federal acres; 99,833 Private acres

Table 3. Herd Numbers, 1975, 1973, 1971

Herd Name	1975[1]	1973[1]	Estimated 1971
Flanigan	130	96	73
Fort Sage	21	16	6[2]
Mahogany Flat	5	6	5
Granite Peak	10	6	5
Dogskin	9	7	5
Pah Rah	119	101	75
	294	232	169

[1] From Aerial Inventory

[2] There were 6 additional horses on California side.

Table 4. Horse Use by Allotment with Reduction to 1971 Population

Herd Name	Allotment	Present AUM Class I	Estimated 1971 Horse No.	Estimated % Horse Use Per Allot. Per Herd	Forage Reservation For Horses
Flanigan	Flanigan	5062[1]	73	100	876
Fort Sage[3]	Flanigan	5062[1]	1	17	12
	Winnemucca	6942	4	66	48
	Constantia[2]	245	1	17	12
Dogskin	Paiute Cyn.	4034	5	100	60
Granite Peak	Antelope Mtn.	8447	5	100	60
Pah Rah	Cottonwood Cr.[4] & private land	202	54	73	648
	Olinghouse Cyn.	1113	7	9	84
	White Hills	1123	7	9	84
	Mustang	300	7	9	84
Mahogany Flat	Hardscrabble Cyn.	1236	5	100	60
		28704	169		2028 AUMs

6 - Fort Sage, Calif.

[1] Active Use

[2] AUMs Within Nevada

[3] Assume 50% of Use in California

[4] 4020 Federal acres, 99,833 Private acres

Table 5. Wild Horse Numbers in the Pyramid Area (1975)

Herd	Total Horses
Fort Sage Mountain	21*
Flanigan	130
Mahogany Flat	5
Dogskin Mountain	9
Granite Peak	10
Pah Rah Mountains	119
Total	294

* Part of the herd area is in California.

TABLE 6. Horse Population - Established by Alternative 3

Herd Name	1971 Numbers	Number Removed by Alternative	Number Remaining
Flanigan	73	37	36
Fort Sage	6 1/	3	3
Mahogany Flat	5	2	3
Granite Peak	5	2	3
Dogskin	5	2	3
Pah Rah	75	50 2/	25
TOTAL	169	96 3/	73

1/ 50% of total herd in Nevada

2/ High reduction due to limited AUMs available on national resource lands

3/ Numbers of livestock to be reduced also

5/20/76

Copies to: David R. Balding
Tyrcott
Rowland.

May 20, 1976

Mr. L. Paul Applegate, District Manager,
Carson City District,
Bureau of Land Management,
801 N. Plaza Street,
Carson City, Nevada 89701

Dear Paul:

Mrs. Lappin and I are deeply appreciative of the time you and members of your staff have spent with us in regard to the removal of free-roaming horses and the establishment of the Flanigan Wild Horse Area in the Pyramid Planning Unit, and we are pleased that you do not plan to commence the removal operation until after June 30th in order to avoid stress on mares in foal.

It was in February that our first meeting took place, in our office at 63 Keystone Avenue, and at that time a map indicating 1973 and 1975 horse populations in certain areas of the planning unit was left with us, together with the booklet PYRAMID-LONG VALLEY LAND USE GUIDES. Page 20 of that booklet lists areas where free-roaming horses will be removed, and the reasons therefor. We have stated orally that we do not support the plan in its entirety. I am enclosing a copy of our current newsletter which contains a statement of our position in regard to removal of wild horses from the public lands . . specifically the last paragraph on page 3 and the first on page 4.

On April 26, 1975 we met with you, Norman Murray and Pardee Bardwell at the Federal Building in Reno at your invitation, to discuss the program further. We reiterated our opposition to the elimination of the small numbers in the Mahogany Flat and Dogskin Mountain areas (14) and in the Fort Sage and Granite Peak areas (31). At that time Mr. Murray assured us that it wasn't of sufficient consequence to BLM to take a hard stand either way, and the inference was that they could well be left alone. However, after careful study of your Environmental Analysis Record and your Flanigan Wild Horse Herd Management Plan delivered to us at that time, we find that your original plan as outlined to us in February has not been altered to indicate that the wild horses in those areas in question are to be left alone to roam free.

The purpose of this letter is to be of record with your office, with the State Office and with the Washington Office that we are unable to justify their removal to ourselves and to the public in whose interest you are mandated by Congress to <u>protect</u> wild horses and burros, as well as to manage and control them, and we will oppose the removal of the following:

WHOA!

WILD HORSE ORGANIZED ASSISTANCE

INC.

A Foundation for the Welfare of
Wild Free-Roaming Horses and Burros

P. O. Box 555
Reno, Nevada 89504
Telephone 323-5908
Area Code 702

Dear Friend:

WELCOME to full membership in Wild Horse Organized Assistance!

We are greatly encouraged by your recent response to our newspaper pleas for help and are delighted you've seen fit to actively join WHOA!'s program of protection for wild horses and burros.

Your support will help WHOA! in the most recent crisis we face . . . . court action brought about by the decision of the three-judge panel in New Mexico that the Wild Free-Roaming Horse and Burro Act of 1971 is unconstitutional. That Act was passed by Congress without a single dissenting vote, which represents a clear mandate by the public that it wants these animals under a protection, management and control program to insure their survival on the public land (your land and ours) of the United States.

In addition, your support will help WHOA! spread the message of kindness and protection to schools, to homes, to organizations, and will make it possible for us to respond immediately to other crises that threaten to nullify all that has been accomplished in a quarter of a century of struggle in behalf of wild horses and burros.

Again, our sincere thanks.

Very sincerely yours,

Velma B. Johnston

Wild Horse Annie, who is
Mrs. Velma B. Johnston -
Chairman - Board of Trustees

VBJ/hr

14 from Mahogany Flat and Dogskin Mountain areas. You give as your reason "their small number cannot be adequately managed at their present locations". We call your attention to PL 92-195 and the statement therein that "All management activities shall be at the minimal feasible level". Could they not be just left alone?

31 from Fort Sage and Granite Peak areas. You allege competition with the Lassen-Washoe deer herd which are declining in number. Horses are grazers and deer are browsers, and they do not compete for forage unless there is an over-population of either or both, which obviously is not the case here. There is evidence of decline in deer herds throughout the West, some in areas uninhabited by wild horses, and to fix the blame for the decline in the Lassen-Washoe deer herd on wild horses would, in our opinion, be speculation only, particularly when so few horses are involved.

We do not oppose the removal of horses in the Pah Rah Mountains because of fragmented public and private land patterns and the development going on. Our views on that specific area are dealt with in the newsletter, beginning on page 2.

We have reservations about the establishment of the intensive wild horse management area in the Flanigan District, as you have stated the permittee, Earl Batteate, intends to appeal any reduction of his permitted use. Also, although Mr. Murray stated to us there is ample water in the District, we find his statement contrary to information provided on page 14 of your Environmental Analysis Record: "Water is limited throughout the planning unit. Within the proposed horse area there are 18 springs and two small creeks. The flow in these creeks, East and West Cottonwood Canyons, is extremely limited." If, however, the wild horses have managed to survive there thus far, it is quite likely they will continue to do so in the limited numbers you have decided upon, provided the scant water supply is not diminished in any way, through diversion, for instance.

We believe you will note throughout our newsletter that our relations with the Bureau of Land Management have been of a cooperative nature. There have been many other instances, too, of our support of BLM policies. For instance, we have gone on record publicly and to our elected officials in support of the 1976 Range Management Program and our views were published in the magazine of Defenders of Wildlife, a prestigious and widely distributed publication; we have gone all out publicly, and to our elected officials in support of the Senate-passed Organic Act and plan to support the opposition to the House Interior Committee's version when it is debated on the floor of the House in accordance with telegrams we have sent today through our other organization International Society for the Protection of Mustangs and Burros. We like the cooperative aspect of our activities, and intend to continue, but we do feel that our credibility would be subject to question if we failed to register opposition, and follow it with action, in instances of management just for the sake of managing, as in the Mahogany Flat and Dogskin Mountain proposal, or reductions based on unsubstantiated allegations as in the Fort Sage and Granite Peak proposal.

Very sincerely yours,

Velma B. Johnston (Mrs. Charles C.)
Chairman - Board of Trustees

TRANSCRIPTION OF NOTES ON VISIT OF CARSON CITY DISTRICT BLM TO OFFICE ABOUT FEBRUARY ~~XXXXXXX~~ 17, 1976 (DAWN AND I.)

Pardee Bardwell, Wildlife Biologist. Chris Erb, Range Conservationist.

Flanigan District. 96 head in 1973; 130 head in February, 1975. Want to reduce to 75. Claimed by Batteate as offspring of the Heller horses (from whom the ranch was purchased). Turned down by BLM as lack of sufficient information to substantiate the claim. Will reeuce AUMS 1200 and BLM expects he will appeal.

4995 AUMs active and used. 2306 suspended. Flanigan was chosen because it is not involved in the ~~dee~~ deer herd area. Pah Rah at least 60% private land.

Bob Marshall, attorney for Curtiss-Wright, says they are gathering all on Curtiss-Wright property.

A maximum of 219 horses will need homes in the Pyramid Planning Unit.

Permanent installations: two wing traps at head of Cottonwood Canyon East side of Virginia Peak. Water trap at Doby Spring. Fred True Well - sorting and holding. Shipping to Reno. Planning to manage by sex and general age. Not by color. Propose a couple of fences. The horse area is the ~~ar~~ ranch summer range. To keep the attle off they will need a fence. 315 head 6-15 to 11-30. 3 20,000 acre parcels. (If / 2800 AUMs available in the summer range.)