



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

CARSON CITY DISTRICT OFFICE

1535 Hot Springs Rd., Ste. 300

Carson City, NV 89706-0636



IN REPLY REFER TO:

4700
(NV-03480)

JUN 27 1990

Dear Interested Party:

Enclosed is the Draft Lahontan Allotment, Dogskin HMA and Antelope Mountain Allotment Capture Plan and Environmental Assessment for your review and comment.

Please submit your comments to this office by August 1, 1990, to be considered in the final plans and EA.

Sincerely yours,

James W. Elliott
District Manager

3 Enclosures:

1. Lahontan Allotment Capture Plan and EA. (draft). (18 pp)
2. Dogskin HMA Capture Plan and EA. (draft). (17 pp)
3. Antelope Mountain Capture Plan and EA. (draft). (17. pp)

ANTELOPE MOUNTAIN ALLOTMENT WILD HORSE REMOVAL PLAN
(DRAFT)

I. Purpose and Authority

The proposed action is to restore the range to a thriving natural ecological balance and prevent further deterioration of the range threatened by an over population of wild horses which have established home ranges outside of the Granite Peak and Dogskin Herd Management Areas (HMA). The proposed action will remove those wild horses with home ranges outside of the HMA. Also these wild horses are disturbing fences and water regulating devices outside of the HMA. This disturbance has already weakened recently repaired fences and if continued may result in livestock and wild horses moving into other allotments or pastures. The Wild Horse and Burro Act of 1971 (Public Law 92-195) Sec. 2. (2) and Sec. 2. (i-iv) provides the authority for the proposed actions.

no water in HMA

II. Area of Concern

The area of concern is the portion of the Antelope Mountain and Paiute Allotments which are outside of the Granite Peak and Dogskin HMAs also wild horses have established home ranges in the Red Rock Allotment, these horses will also be removed. The location of the area is shown on the attached map 1.

test. & doc of

III. Numbers of Wild Horses

Based on an aerial census conducted in 1989 and various ground censuses it has been determined that 79 wild horses occupy the area outside of the HMA.

several days when no horses

IV. Methods for Removal and Safety

The methods employed during this capture operation will be herding horses with a helicopter to a trap built with portable panels. The Bureau of Land Management will contract with a private party for this operation. Two or more Bureau employees will be supervising the contractor at all times during the gathering operation. The following stipulations and procedures will be followed during the contract to ensure the welfare, safety and humane treatment of the wild horses and that wild horses are removed from proper areas.

A. Roundup Procedures within Contract Area:

The Contracting Officer's Representative (COR) or Project Inspectors (PI) will determine specific roundup areas and numbers of animals within general contract areas as animal concentration, terrain,

physical barriers and weather conditions dictate. Upon determination of the specific roundup areas, the COR/PI will select the general location of trap sites in which to herd the animals. Animal concentration, terrain, physical barriers and weather conditions will all be considered when selecting trap sites. All wild horses will be removed from areas outside of the HMAs.

B. Motorized Equipment

1. All motorized equipment employed in the transportation of captured animals shall be in compliance with appropriate State and Federal laws and regulations applicable to the humane transportation of animals.

2. Vehicles shall be in good repair, of adequate rated capacity, and operated so as to insure that captured animals are transported without undue risk of injury.

3. Only stock trailers shall be allowed for transporting animals from traps to temporary holding facilities. Only Bobtail trucks, stock trailers, or single deck trucks shall be used to transport animals from temporary holding facilities to final destination. Sides of stockracks of transporting vehicles shall be a minimum height of 6 feet 6 inches from vehicle floor. Single deck trucks with trailers 40 feet or longer shall have two partition gates to separate animals. Trailers less than 40 feet shall have at least one partition gate to separate the animals. Each partition shall be a minimum of six feet high and shall have a minimum 5 foot wide swinging gate. The use of double deck trailers is unacceptable and shall not be allowed.

4. All vehicles used to transport animals to final destination shall be equipped with at least one door at the rear end of the vehicle which is capable of sliding either horizontally or vertically.

5. Floors of vehicles and loading chute shall be covered and maintained with a non-skid surface such as sand, mineral soil or wood shavings, to prevent the animals from slipping. This will be confirmed by a BLM employee prior to loading (every load).

6. Animals to be loaded and transported in any vehicle shall be as directed by the COR/PI and may include limitations on numbers according to age, size, sex, temperament and animal condition. A minimum of 1.4 linear foot per adult animal and .75 linear foot per foal shall be allowed per standard eight foot wide stock trailer/truck.

The BLM employee supervising the loading of the wild horses to be transported from the trap to the temporary holding corral will require separation of small foals and weak horses from the rest, if they could be injured during the trip. Distance and condition of the road and animals will be considered in making this determination. Horses shipped from the temporary holding corral to the BLM facility will

normally be separated by studs, mares and foals (including small yearlings). However, if the numbers of these classes of animals are too few in one compartment and too many in another, animals may be shifted between compartments to properly distribute the animals in the trailer. This may include placing a younger, lighter stud with the mares or a weak mare with the foals. Further separation may be required should condition of the animals warrant.

The BLM employee supervising the loading will exercise authority to off-load animals should feel there be too many horses on the trailer or truck.

7. The COR/PI shall consider the condition of the animals, weather conditions, type of vehicles, distance to be transported, and other factors when planning for the movement of captured animals. The COR/PI shall provide for any brand inspection or other inspection services required for the captured animals.

It is currently planned to ship all horses to the Palomino Valley facility. Communication lines have been established with the Palomino Valley personnel involved in off-loading the horses, to receive feedback on the condition of shipped horses. Should problems arise, shipping methods or separation of the horses will be changed in an attempt to alleviate the problems.

8. If the COR/PI determines that dust conditions are such that the animals could be endangered during transportation, the contractor will be instructed to adjust speed. The maximum distance over which animals may have to be transported on dirt road is approximately 10 miles.

Periodic checks by BLM employees will be made as the horses are transported along dirt roads. If speed restrictions are placed in effect, then BLM employees will, at times, follow or time trips to ensure compliance.

C. Trapping and Care

1. All capture attempts of wild horses shall be accomplished by the utilization of a helicopter. A minimum of one saddle horse shall be immediately available at the trap site to accomplish roping if necessary. Under no circumstances shall animals be tied down for more than one hour.

Since all wild horses are to be removed from outside of the HMA, roping will be allowed if certain individual horses continue to elude helicopter herding operations.

2. The helicopter shall be used in such a manner that bands of horses will remain together. Foals shall not be left behind.

The Carson City District will use an observation helicopter as the

primary means from which to supervise the use of the project helicopter. In the absence of an observation helicopter, a saddle horses may be used to place a BLM observer on a point overlooking the area of the helicopter herding operations.

3. The rate of movement and distance the animals travel shall not exceed limitations set by the COR/PI who will consider terrain, physical barriers, weather, condition of the animals and other factors.

BLM will not allow horses to be herded more than 10 miles nor faster than 20 miles per hour. The COR/PI may decrease the rate of travel or distance moved should the route to the trap site be steep or rocky enough to pose a danger or cause avoidable stress. Animal condition will also be considered in making distance and speed restrictions.

Temperature limitations are 10 degrees F. as a minimum and 95 degrees F. as a maximum. Special attention will be given to avoiding physical hazards such as fences. Map 1 shows locations of fences and any other potential hazards.

4. It is estimated that 3 trap locations will be required to accomplish the work. All trap locations and holding facilities must be approved by the COR/PI prior to construction. The contractor may also be required to change or move trap locations as determined by the COR/PI. All traps and holding facilities not located on public land must have prior written approval of the landowner.

If tentative trap sites (Map 1) are not located near enough to the concentrations of horses, then the trap site will not be approved. The COR/PI will move the general location of the trap closer to the horses. Trap sites will not be approved where barbed-wire fences are used as wings, wing extensions, or to turn the horses, during herding, toward the trap.

5. All traps, wings and holding facilities shall be constructed, maintained and operated to handle the animals in a safe and humane manner and be in accordance with the following:

a. Traps and holding facilities shall be constructed of portable panels, the top of which shall not be less than 72 inches high, the bottom rail of which shall not be more than 12 inches from the ground level. All traps and holding facilities shall be oval or round in design.

b. All loading chute sides shall be fully covered with plywood or like material. The loading chute shall also be a minimum of 6 feet high. *non slip material on chute*

c. All runways shall be a minimum of 20 feet long and a minimum of 6 feet high and shall be covered with plywood or like material a minimum of 1 foot to 5 feet above ground level.

d. Wings shall not be constructed out of barbed-wire or other materials injurious to animals and must be approved by the COR/PI.

e. All crowding pens including the gates leading to the runways shall be covered with material which prevents the animals from seeing out (plywood, burlap, etc.) and shall be covered a minimum of 1 foot to 5 feet above ground level. Eight linear feet of this material shall be capable of being removed or let down to provide a viewing window.

f. All pens and runways used for the movement and handling of animals shall be connected with hinged self-locking gates.

6. No fence modification will be made without authorization from the COR/PI. The contractor shall be responsible for restoration of any fence modification which he has made.

If the route the contractor wishes to herd horses passes through a fence, the contractor will be required to roll up the fencing material and pull up the posts to provide at least one-eighth mile gap. The standing fence on each side of the gap will be well-flagged for a distance of 300 yards from the gap on each side.

7. When dust conditions occur within or adjacent to the trap or holding facility, the contractor shall be required to wet down the ground with water.

8. Alternate pens, within the holding facility shall be furnished by the contractor to separate mares with small foals, sick and injured animals, and estray animals from the other horses. Animals shall be sorted as to age, number, size, temperament, sex, and condition when in the holding facility so as to minimize injury due to fighting and trampling.

As a minimum, studs will be separated from the mares and foals when the animals are held overnight.

9. Animals shall be transported to final destination from temporary holding facilities within 24 hours after capture unless prior approval is granted by the COR/PI for unusual circumstances. Animals shall not be held in traps or temporary holding facilities on days when there is no work being conducted except as specified by the COR/PI. The contractor shall schedule shipments of animals to arrive at final destination between 6:00 a.m. and 4:00 p.m. No shipments shall be scheduled to arrive at final destination on Sunday.

10. The contractor shall provide animals held for 5 hours or more in the traps or holding facilities with a continuous supply of fresh clean water at a minimum of 10 gallons per animal per day. Animals held for 10 hours or more in the traps or holding facilities shall be

provided good quality hay at the rate of not less than two pounds of hay per 100 pounds of estimated body weight per day.

11. It is the responsibility of the contractor to provide security to prevent loss, injury or death of captured animals until delivery to final destination.

12. The contractor shall restrain sick or injured animals if treatment by the government is necessary. The COR/PI will determine if injured animals must be destroyed and provide for destruction of such animals. The contractor may be required to dispose of the carcasses as directed by the COR/PI.

13. When refueling, the helicopter shall remain a distance of at least 1,000 feet or more from animals, vehicles (other than fuel truck), and personnel not involved in refueling.

V. Disposition of Removed Animals

The wild horses and burros will be sent to Palomino Valley Wild Horse and Burro Placement Center to be processed for adoption.

Impounded, privately-owned animals will be processed as outlined in the Bureau of Land Management, Nevada State Office Instruction Memoranda NV-84-116 and NV-85-416.

VII. Responsibility

The District Manager is responsible for maintaining and protecting the health and welfare of the wild horses. To ensure the contractor's compliance with the contract stipulations, the COR and PIs all from the Carson City District, will be on site. Also, the Lahontan Area Manager and the Carson City District Manager are very involved with guidance and input into this removal plan and with contract monitoring. The health and welfare of the animals is the overriding concern of the District Manager, Area Manager, COR and PIs.

The COR and/or PI will constantly, through observation, evaluate the contractor's ability to perform the required work in accordance with the contract stipulations. Compliance with the contract stipulations will be through issuance of written instructions to the contractor, stop work orders and default procedures should the contractor not perform work according to the stipulations.

Prior to issuance of the "Notice to Proceed" to the contractor, the COR and PIs will inspect the equipment to be used during the contract, to insure the equipment meets or exceeds the standards contained in the contract stipulations. Prior (less than 20 days) to the start of the contract and constantly during the course of the contract the COR and/or PIs will evaluate the conditions which may cause undue stress to the animals. The factors considered will include animal condition, prevailing temperatures, drought conditions, soil conditions, topography, animal distribution, distance animals travel to water, quantity of available water and condition of roads that animals are to be transported over. These factors will be evaluated to determine if additional constraints other than

those already discussed above, need be initiated in order to safely capture and transport the animals (i.e. veterinarian present, or delay of capture operations). This is of special concern during this year of possible drought which may intensify the impact of removal operations on the animals and the roads.

ENVIRONMENTAL ASSESSMENT

Antelope Mountain Allotment Wild Horse Removal

I. INTRODUCTION AND PURPOSE

The purpose of the proposal is to restore the range outside the Herd Management Areas (HMA) to a thriving natural ecological balance and multiple use relationship and prevent further deterioration of the vegetation community threatened by an overpopulation of wild horses outside of the Antelope Mountain and Dogskin HMA. These horses which are outside of the HMAs are causing overutilization of the Antelope Mountain and Paiute Allotments (utilization map) and utilizing private property and other lands not administered by the BLM as part of their home ranges. This proposal is in conformance with the Lahontan Resource Management Plan (RMP). The proposed action involves removals in order to correct resource degradation identified from analysis of rangeland monitoring data from the Antelope Mountain and Paiute Allotments. By removing these wild horses, resource damage will be reduced as directed by 43 CFR part 4710.4; Wild, Free Roaming Horse and Burro Regulations.

The wild horses which have moved out of the HMA face a very real danger of being cut off from water. This is due to the 3 pasture rotation system of Antelope Mountain Allotment and fencing in other allotments that the wild horses now occupy. These fences must be closed to prevent livestock from moving to areas that they are not authorized to use. These fences were built prior to the passage of the Wild Horse and Burro Act. Because of the extensive fencing outside of the HMA and rapid changes in livestock water availability the wild horses may become trapped in a pasture without water. When livestock are not present in a pasture or allotment the permittee no longer pumps or hauls water. This situation has already occurred in this area where a pasture outside of the HMA had to be opened to allow wild horses into a different pasture also outside of the HMA. If this situation was not detected when it was it is likely that all 14 wild horses would have been subjected to adverse physiological stress beyond their bodies capacity to compensate. The Allotment Management Plan which outlined the rest rotation system was signed in 1969.

*do do
horses in
allotment*

Relationship to Other Environmental Documents

This EA is tiered to the Reno Grazing Environmental Impact Statement (EIS) which analyzed the general ecological impacts of managing rangelands in the Reno area under a program of monitoring and adjustment of wild horses and livestock. This EA is a project specific refinement of the EIS focused on the removal of excess wild horses in the Antelope Mountain Allotment. The decisions regarding overall rangeland management analyzed in the Reno EIS will not be changed by the Antelope Mountain Allotment Removal Plan. Both documents are available for public review at the Carson City District Office.

II. DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

- A. The proposed action is to remove excess wild horses with the use of a helicopter and other motorized equipment. The wild horses would be herded by a helicopter into traps constructed of portable steel panels. The Bureau of Land Management would contract with a private party for the removal operation. The contractor would be supervised at all times by at least two Bureau employees. A estimated total of 79 excess wild horses are proposed for removal in order to remove all wild horses from areas outside of the HMAs.
- B. Alternative No. 1 is to conduct the removal by herding the wild horses from horseback. Riders would herd horses into traps built of portable steel panels.
- C. Alternative No. 2 would be to construct fences around water sources and trap the horses as they water.
- D. The no action alternative is to not conduct the wild horse removals.

III. AFFECTED ENVIRONMENT

A. Wild Horses

The Antelope Mountain and Paiute Allotments are located approximately 20 miles north of Reno, Nevada. These Allotments lie within the Carson City District of the Bureau of Land Management.

The locations of the allotments and HMAs are shown on the attached map as well as the capture area boundaries (map 1).

At the present time, the wild horses have virtually unrestricted movement within the HMAs and the majority of the allotment, contingent upon which gates are open. A majority of the wild horses are using areas outside of the HMA, as their home range. This is due to a population increase beyond the HMAs capacity to produce sufficient forage and supply adequate space. The limited area of the HMAs results in increased intraspecific interactions which at current population levels lead to many of the wild horses moving to areas outside of the HMAs.

Many of the horses have home ranges which include private land. In this situation, these wild horses may intermingle with privately owned horses, thereby, making them difficult or impossible to identify.

*Brand Laws - range problem
not wh problem*

B. Livestock Use

Livestock grazing occurs within the Antelope Mountain Allotment from April 15 - October 31. The allotment is divided into 3 pastures which are grazed on a rest rotation system. The HMA is located

What water is available in pasture 2? is it always available?

entirely within pasture 2. Livestock grazing occurs within the Paiute Allotment from July 26 - November 22.

D. Water and Riparian

The wild horses are causing overutilization of springs and riparian areas outside of the HMA.

E. Cultural Resources

Cultural resources in the form of arrowheads and fragments may exist within the gather area.

F. Wildlife Use

The allotments include habitat for mule deer (winter and year long), pronghorn, sage grouse, chukar, mourning dove, many raptors and other game and nongame species.

G. Threatened and Endangered Species

There are no known threatened, endangered, sensitive or candidate species within the HMAs.

H. Key Species

Currently utilization of key species (indian ricegrass & needle grass) is in excess of 55%.

IV. ENVIRONMENTAL IMPACTS/MITIGATION MEASURES

A. Proposed Action

Removing the wild horses from areas outside of the HMA will benefit mule deer, chucker, sage grouse, pronghorn and many other species of wildlife. Also Indian ricegrass, bottlebrush squirreltail, needle grass and many other species of plants will benefit this will aid in meeting the management objectives of the Lahontan RMP (improve vegetative condition).

Riparian areas (Bird spring, Juniper Spring, Whitney Spring, Lucky Spring and one unnamed spring) south and east of the HMA will improve due to the decrease in grazing pressure after the excess wild horses are removed.

Unavoidable impacts in the form of injuries to the horses may occur as a result of the removal process. Death loss is not expected to exceed 2% of the horses captured at the trap site. Potential injuries and fatalities can be limited through strict enforcement of contract specifications for safety and humane treatment of animals. BLM representatives would be monitoring the contractor's activities at all times during removal to ensure compliance with specifications and

humane treatment of animals.

Some stress to the horses would be associated with the helicopter herding operations, however, after adoption, the horses would become accustomed to captivity and most would receive proper care.

Small localized areas within the vicinity of trap sites and holding facilities would receive trampling and the subsequent loss of vegetation. However, overall the vegetative resource would improve due to the reduction in grazing pressure. Forage availability should increase and utilization levels decrease.

No impacts would occur to cultural resources, as the trap sites would be cleared prior to construction.

Removal of wild horses will prevent further deterioration of the range due to the wild horse overpopulation. By removing the excess wild horses the remaining population (within the HMAs) will allow for a thriving ecological balance between wild horses, wildlife, livestock and vegetation.

B. Water Trapping

General impacts from a reduction in wild horse numbers would be identical to those outlined for the proposed action. Once captured, the handling and transportation of the animals would be the same as the proposed action. As most injuries to wild horses occur during handling and transportation, the injury and fatality rate would remain approximately the same. Once prepared for adoption, the animals become accustomed to captivity and most would receive proper care.

Small localized areas within the vicinity of trap sites and holding facilities would receive trampling and subsequent loss of vegetation. Overall, the vegetation resource would improve due to the reduction in grazing pressure. Forage availability should increase and utilization levels decrease. This would occur in both the short and long term positive effects.

No impacts would occur to cultural resources, as the trap sites would be cleared prior to construction.

Due to the time necessary for construction of complex water traps and the prolonged period it would take for the animals to become accustomed to using the traps, it would take more manpower to implement this alternative. Therefore, it would be significantly more expensive than the proposed action.

C. Horseback Trapping

General impacts from a reduction in wild horse numbers would be identical to those outlined for the proposed action. Once captured, the handling and transportation of the animals would be the same as

the proposed action. As most injuries to wild horses occur during handling and transportation, the injury and fatality rate would remain approximately the same. Once prepared for adoption, the animals become accustomed to captivity and most would receive proper care.

Some localized areas within the vicinity of trap sites and holding facilities would receive trampling and subsequent loss of vegetation. Overall, the vegetation resource would improve due to the reduction in grazing pressure. Forage availability should increase and utilization levels decrease. This impact would have both short and long term positive effects.

No impacts would occur to cultural resources as the trap sites would be cleared prior to construction.

Bands of horses are not controlled effectively with horseback herding, therefore, many bands are spilled or individual horses separated from the band. This results in increased social structure disruption and/or orphaned foals, which requires attempts to capture these separated animals. The number of animals captured per day versus the proposed actions is significantly fewer, therefore, it is very time consuming resulting in very high capture costs.

This method of capture is very tiring for the saddle horses which results in injuries to both the saddle horses and personnel involved.

D. No Action

The no action alternative would result in no wild horses being removed. The animals would not undergo stress, injuries, nor fatalities related to capture, handling and transportation. However, in the long term, the population would increase to a point where excessive utilization would eliminate nearly all the forage plant species. The animals would suffer stress searching for food and may be subject to starvation. Attainment of Land-Use-Planning objectives would not be met.

The population would continue to expand both within and outside of the HMA, further impacting the vegetation and wildlife. This would lead to the loss of many species of wildlife through starvation or dispersal to areas outside of the HMA. The physical condition of the wild horses would continue to deteriorate.

Habitat improvement would not be realized with this alternative. The frequency of key species (indian ricegrass & needlegrass) would decline further. The animals would continue to search for food and further degrade their habitat, thereby reducing the carrying capacity of the area which would cause adverse physiological stress to the wild horses and other species occupying the area.

Riparian areas would continue to be over utilized further deteriorating the wildlife habitat.

Further deterioration of the range would occur and the area will not be in a state of thriving natural ecological balance.

Signature Page

Draft

14 & 15

V. Public Involvement

This environmental assessment and capture plan is being sent to the following persons, groups and government agencies for review and comment. This review and comment is considered as the consultation and coordination as required in the Lahontan Resource Management Plan.

American Bashkir Curley Register
American Horse Protection Association
American Humane Association
American Wild Mustang & Burro Foundation
Animal Protection Institute
Carson City District Grazing Advisory Board
Chuck Mills
Commission for the Preservation of Wild Horses
Compassion for Animals
Craig C. Downer
Craig London
Debra Allard
Feather River Ranch
Fund for Animals
Humane Society of So. NV.
International Society for the Protection of Wild Horses and Burros
Kathy McCovey
Life Foundation
Nan Sherwood
National Mustang Association
National Wild Horse Association
Nevada Cattlemen's Association
Nevada Department of Wildlife
Nevada Federation of Animal Protection Organization
Nevada Humane Society
Nevada Land Action Association
Nevada State Clearinghouse
Nevada State Division of Agriculture
Rebecca Kunow
Resource Concepts
Save the Mustangs
Sierra Club
The Nature Conservancy
U.S. Fish and Wildlife Service
U.S. Humane Society
United States Wild Horse and Burro Foundation
Washoe County Board of Commissioners
Wild Horse Organized Assistance

additional water must be
developed in the ^{northend} Granite HMA
and southeast end of Dogskin






Horses moving out into Bedell
due to cowboys camping
at water sources at Bird Spring
Jumper Spring & Whitney Spring



Granite - what water sources are
available within the Granite HMA?

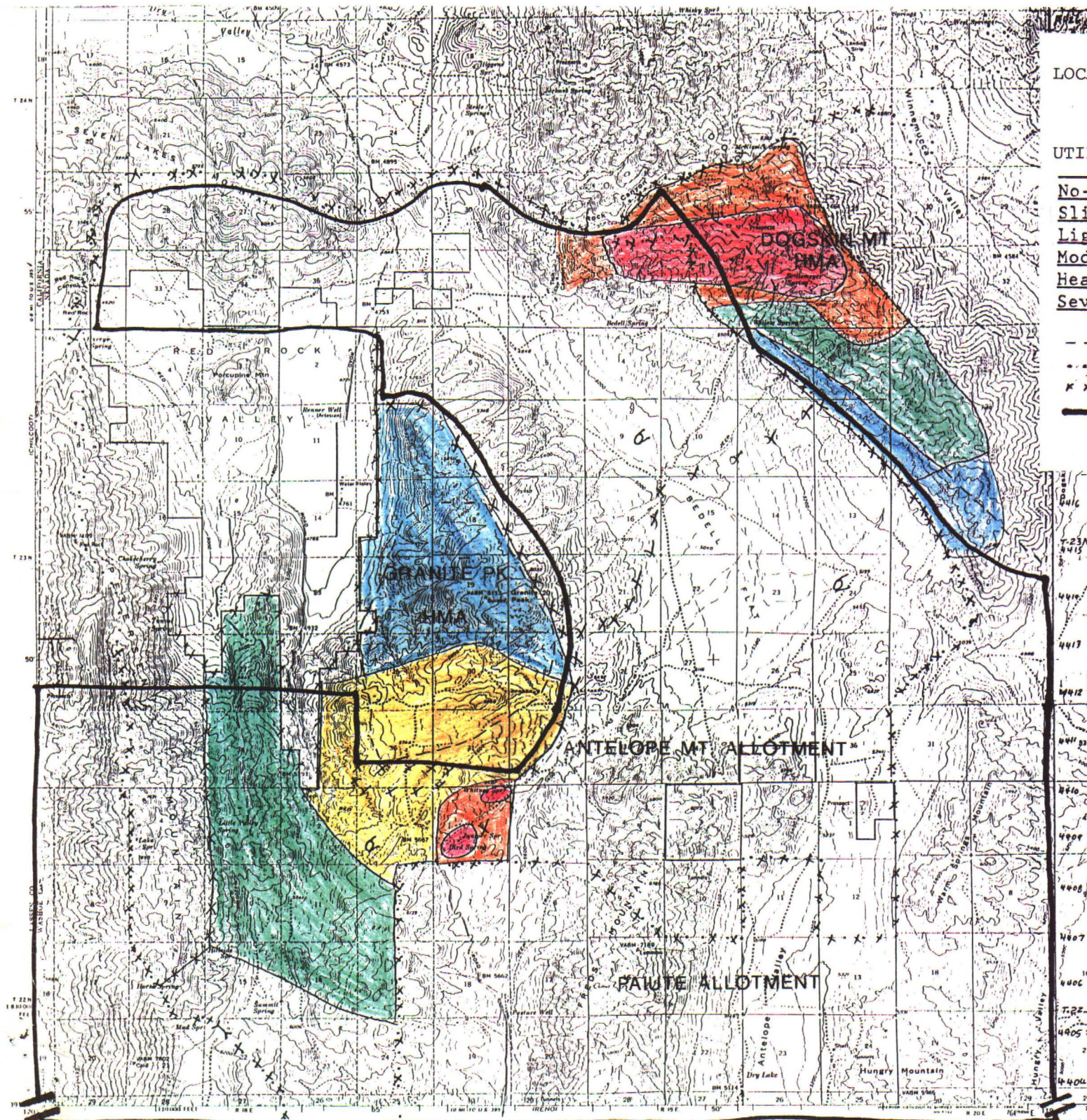
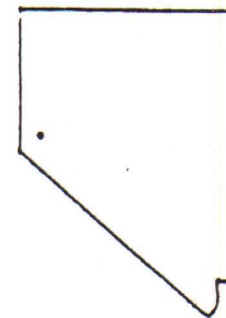
Dogskin - is Willow Spring available
to wild horses or is it fenced or turned off?
what is the Utilization data for that
portion of the Dogskin HMA that is
not indicated on the map?

LOCATION OF HMAs & ALLOTMENTS

UTILIZATION KEY

No-Use	
Slight Use	
Light Use	
Moderate Use	
Heavy Use	
Severe Use	

- - - - HMA Boundary
- · · · · Allotment Boundary
- x x x x x Fencing
-  Capture Area
-  Trap Sites



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CATHIE BARCOMB
Assistant to the Director



**COMMISSION FOR THE
PRESERVATION OF WILD HORSES**

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July 27, 1990

Ken Walker, District Manager
Ely District - BLM
Star Route 5, Box 1
Ely, Nevada 89301 *CARSON*

Dear Mr. Walker,

Thank you for the opportunity to review and provide comments on the draft Removal Plan for the Antelope Wild Horse Gather and Associated EA No. NV-040-0-23.

The Commission has two responsibilities when participating in the land use planning process. The allotment evaluations and multiple use decisions; we must respond to the Nevada State Clearinghouse as well as the federal agencies. Therefore it is imperative that the Commission be apprised of any issue that may affect our responsibilities as a state agency. The Commission just recently was made aware of a previous Paiute Allotment Evaluation and was advised the other Allotment Evaluation would not be available for some time. It was our understanding of Nevada State Office policy that these decisions, under Instruction Memorandum 90-295, were to be multiple use decisions. Please clarify for us how the above mentioned capture plans are exempt from this policy.

Our review of Reno Draft EIS (table 1-4), lists Granite Peak and Dogskin as HUA's, but nothing in the ROD or subsequent documents clarify how the HUA became an HMA. We do not question the fact that the HUA's were indeed 1971 historical habitat. BLM contends that it is we who are confused over HUA's and HMA's. With participation in the LUP, the public was led to believe that HUA's were historical habitat and that HMA's were areas where BLM would more intensely manage their habitat. Please explain how the maps provided in the Draft Reno EIS compare to table 14 and how we got to the present situation.

4710.3-1 properly establishes how BLM will delineate the HMA's including their habitat requirements. Yet the Granite Peak HMA requires wild horses to go outside the HMA to obtain water. At a public meeting in Red Rock, property owners were advised by BLM personnel that both areas have sufficient waters in their habitat, however, the wild horse specialist states that horses must go outside Granite Peak to obtain water on private lands. Please clarify as to which situation actually occurred. It was also

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advised at that meeting that no horses would be removed from within the HMA's and that all horses outside the boundary the day of capture would be rounded up. Please assure this Commission that the levels that establish a thriving ecological balance within their herd areas will be maintained and how you propose to insure that.

The utilization map that is enclosed shows that utilization has been done for about two thirds of the HMA, we strongly recommend that the entire HMA be monitored for any future adjustments. We question whether all alternatives have been considered; 1) fence removals within the HMA, 2) water development, and/or 3) that livestock be excluded from the HMA. All of which would permit multiple use on the entire allotment, since horses are not allowed outside of their HMA. Also, we inquire as to whether the Bureau has sought cooperative agreements with private landowners or a cooperative agreement with the water right holder for year round water availability for the wild horses. We too are concerned with the considerable amount of internal fencing within the HMA that would trap wild horses from water, we strongly recommend the bureau design long term objectives resolving this issue.

Thank you for the opportunity to review and comment on this capture plan.

Sincerely,

Cathy Barcomb
for

TERRI JAY
Executive Director

TJ/cb