

United States Department of the Interior

BUREAU OF LAND MANAGEMENT

CARSON CITY DISTRICT OFFICE

1535 Hot Springs Rd., Ste. 300 Carson City.NV 89706-0638



4700 MNV-03480)

Dear Interested Party:

Enclosed is a draft Removal Plan, Environmental Assessment (EA) and draft Finding of No Significant Impact Statement (FONSI) for the area outside of the Lahontan Herd Management Area. This EA does not become final until the Finding of No Significant Impact/Decision Record is signed. Please submit your comments to this office by close of business June 10, 1993, to be considered.

Sincerely yours,

James W. Elliott District Manager

2 Enclosures:

Draft Clan Alpine Wild Horse Removal Plan, and FONSI, 15pp.
 28 Day Notice

LAHONTAN WILD HORSE REMOVAL PLAN (DRAFT)

I. Purpose and Authority

The proposed action is to restore the range to a thriving 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 Lahontan Herd Management Area (HMA). The proposed action will remove those wild horses with home ranges outside of the HMA. The Wild Horse and Burro Act of 1971 (Public Law 92-195) Sec. 10. and 43 CFR 4710.4 provides the authority for the proposed action.

II. Area of Concern

The area of concern is the portion of the Lahontan Allotment which is outside of the Lahontan HMA. The location of the area is shown on the attached map 1.

III. Numbers of Wild Horses

Based on the most recent census conducted in November of 1991 there are at least 87 wild horses outside of the HMA.

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 probably contract with a private party for this operation. Bureau employees will be supervising the contractor (if used) 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 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 HMA. It is estimated that 87 wild horses will need to be removed.

B. Motorized Equipment

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. Minimum specifications are contained within the State Gather Contract. Should conditions warrant the COR/PI have the authority to further modify the specifications.

All vehicles used for transportation shall be at least 6 feet 6 inches in height. The floors and loading chute shall be covered with non-skid material.

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 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 adoptable horses to the Palomino Valley facility. Unadoptable horses may be released into another HMA (Clan Alpine HMA and/or several HMA's within the Walker Resource Area) and would be monitored to assure that they find adequate water.

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 the portion of the Lahontan Allotment which lies 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 may use an observation helicopter 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. Mares will be checked soon after capture to determine if they are nursing. If nursing mares are captured without foals intensive monitoring will be conducted to identify the reason(s) foals are being abandoned and a solution will be developed. The health and well being of the captured animals are paramount and foals will not be left behind.

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 two 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.
 - c. All runways shall be a minimum of 20 feet long and a minimum of 6 feet high and shall be covered with plywood, sheet metal or like material a minimum of 1 foot to 5 feet above ground level.
 - d. 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.
- 6. 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 a gap. The standing fence on each side of the gap will be well-flagged.
- 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. Proposed trap sites and holding facilities will be inventoried prior to construction in order to avoid those areas where cultural resources exist.
- 12. Mares and foals will be paired up soon after capture and separated from other adult horses. Mares that are within the target age group for removal will be shipped to PVC with their foal. Foals of older mares (mares older than the ones selected for removal) that are old enough to wean, will be weaned and shipped to PVC. While holding animals at temporary corrals every effort will be made to pair up mares with foals. Any foals that do not pair up with an mare will be shipped to PVC.
- 13. Foals of older mares which are too young to wean will be released back into the HMA with their mare. In order to minimize stress to the foals, older mares and their foals will be released separately from other mares and stallions. Depending upon the situation they may be released prior to the other animals or after the other animals have been released. Also, we may transport the mares with very young foals in a stock trailer to areas close to their core areas when feasible. The objective will be to maximize the period of time between releasing small foals and other animals. Also, mares with foals will be released in small groups to minimize the likelihood of the adult horses running off too quickly for the foals to keep up.
- 14. Following the release of animals from corrals or trailers, the area surrounding the release site will be monitored to determine the success of the release prior to the contractor moving to another area or the termination of the task order.

V. <u>Disposition of Removed Animals</u>

All of the adoptable wild horses will be sent to Palomino Valley Wild Horse and Burro Placement Center (PVC) to be processed for adoption. Some of the older unadoptable animals may be sent to the Placement Center or they may be taken directly to release sites and released. Unadoptable mares may be spayed or treated with immunocontraceptives. Any mares spayed will be held at PVC until fully recovered.

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.

VI. 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 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.

VII Time Frame

It is anticipated that this removal will occur during late summer or fall. Due to the dense concentration of cotton woods a complete removal of animals from areas outside of the HMA is unlikely, thus, additional gathers may be necessary, therefore, this plan will remain in effect until conditions change substantially.

ENVIRONMENTAL ASSESSMENT

Lahontan Wild Horse Removal and Release

INTRODUCTION

Need for the Proposed Actions.

Currently wild horses that have established home ranges outside of the Lahontan Herd Management Area (HMA) are causing overutilization of the vegetative resource within the Lahontan Grazing Allotment. Also, these horses are utilizing private property and lands not administered by the BLM as all or part of their home ranges.

Horses that are over 9 years of age are not readily adoptable. Thus, the Strategic Plan for Management of Wild Horses and Burros on Public Land (Strategic Plan) signed in 1992 by the Director of the Bureau of Land Management set several goals including placing only adoptable animals into the adoption program and releasing older unadoptable animals into HMA's that are currently under Appropriate Management Levels (AML). Therefore, older unadoptable animals would be released into the Clan Alpine HMA. In order to increase the genetic diversity the horses within several HMA's in the Walker Resource Area some older unadoptable animals may also be released into these areas.

Conformation with Land Use Plans.

This proposal is in conformance with the Lahontan Resource Management Plan (RMP) of 1985 and the Lahontan Rangeland Program Summary Update (RMP) of 1989. Both documents have stated objectives of maintaining populations of wild horses within HMA's. The Lahontan Herd Management Area Plan of 1991 also stated as an objective to maintain wild horses within the Lahontan HMA.

Relationship to Statutes, Regulations, or other Plans.

Both the Code of Federal Regulations (4710.4) and the Wild Horse and Burro Act of 1971, state that wild horses shall be maintained within HMA's. The Strategic Plan and the Wild Horse and Burro Act state that wild horses may be sterilized. Also, the Strategic Plan states that excess animals can be placed in other HMA's which are below AML's.

PROPOSED ACTION AND ALTERNATIVES

Proposed Action.

- A. The proposed action is to remove excess wild horses from the Lahontan Allotment 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 may contract with a private party for the removal operation. The contractor would be supervised at all times by at least two Bureau employees. A total of 87 excess wild horses are proposed for removal. The adoptable animals would be placed into the Bureau's Adopt A Horse program.
- B. The excess unadoptable animals would be released into the Clan Alpine HMA. There are an estimated 50 unadoptable horses within the Lahontan

Allotment. The majority of these would be released into the Dixie Valley and Cow Canyon Allotment portions of the Clan Alpine HMA. Also, some may be released into HMA's within the Walker Resource Area to provide genetic diversity. Mares will be spayed or treated with immunocontraceptives prior to release into the Clan Alpine HMA.

An X-2 freeze mark would be applied to each horse on the hip for permanent identification from the ground or air. If spayed, the mares would not be released until they have fully recovered. The animals would be monitored to insure that they become familiar with water sources, and would be released along a creek.

Alternatives

- A. Conduct the removal by water trapping. Because of the large shore line, water trapping would not be feasible, therefore, this alternative was not analyzed in detail.
- B. Conduct the removal from horse back. Because wild horses are not effectively controlled from horse back this alternative is not feasible, therefore, this alternative was not analyzed in detail.
- C. The following alternatives were considered but not analyzed in detail: Releasing the animals in the Augusta Mt., Flanigan, Fort Sage, Dogskin Mt., Desatoya, Granite Peak, New Pass, and N. Stillwater HMAs would increase the animals further above the carrying capacity of these HMA's. In addition, due to the extended drought there are only limited water sources in these areas. Releasing these animals into the Horse Mt. HMA would result in the animals moving back to the Lahontan Allotment due to the close proximity of this HMA to the Lahontan Allotment. Because of the small size of the South Stillwater HMA, released animals would most likely establish home ranges outside of the HMA.
- D. Keeping the excess unadoptable wild horses at PVC indefinitely is not a feasible alternative. PVC is designed to process and adopt wild horses. Keeping wild horses at PVC would impair the primary mission of the facility as well as exposing the horses to perpetual confinement. Sending excess unadoptable wild horses to a sanctuary is no longer an option since current plans are being formulated to demobilize the sanctuaries. Euthanizing healthy wild horses is also not a option as Congress has withheld appropriations for such an action, and is not acceptable to the general public. Because the alternatives under D are either not feasible or allowable they were not analyzed in detail.
- E. The no action alternative would not result in obtaining a thriving ecological balance, maintaining horses within the HMA, obtaining land use plan objectives, compliance with existing regulations or compliance with the Wild Horse and Burro Act. The wild horses would continue to overutilize areas outside of the HMA and the population would continue to increase outside of the HMA.

AFFECTED ENVIRONMENT

General Setting

The Lahontan Allotment is located approximately 40 miles east of Carson City, Nevada. The Allotment lies within the Carson City District of the Bureau of Land Management. The Allotment and HMA location are shown on the attached map as well as the capture area boundaries (Map 1).

The topography of the Clan Alpine HMA ranges from rolling hills through mountainous terrain from 4,000 to 10,000 feet in elevation. There are 7

creeks with perennial water along with many springs and seeps. Water availability would not be a problem in areas where the wild horses would be released. Part of the Clan Alpine HMA lies within the Clan Alpine Wilderness Study Area (WSA). The excess horses will be released outside of the WSA, however, it is reasonable to expect that many of the released horses will establish home ranges within the WSA.

Affected Resources.

1. Wild Horses

At the present time, the wild horses have virtually unrestricted movement within the Lahontan HMA and the majority of the Lahontan Allotment. A majority of the wild horses are using areas outside of the HMA, as all or part of their home range.

Most of the horses have home ranges which include private land or other lands not administered by the BLM. In this situation, these wild horses may intermingle with privately owned horses, thereby, making them difficult or impossible to identify.

We have also received a written complaint from a property owner stating that the wild horses are taking grass from private lands, fighting with private horses through fences and breaking private fences. The property owner is also very concerned that wild study may steal private mares. When horses fight through a fence the potential for serious injury is great.

2. Livestock Use

Because of excessive use by wild horses the permittee's of the Lahontan Allotment have only used approximately half of their grazing preference. Total preference for the Lahontan Allotment is 1,230 AUM's. The average livestock AUM's used for the past 3 years has been 476 AUM's per year.

3. Water and Riparian

There are no riparian areas located on land administered by the BLM within the Lahontan Allotment, however, the wild horses are using riparian areas administered by the Nevada State Parks.

4. Cultural Resources

Cultural resources in the form of prehistoric hunting and gathering related artifacts or historic mining activities may exist within the gather area.

5. Wildlife Use

Wintering bald eagles use the Lahontan allotment along with many other raptors, deer and other non-game species.

6. Threatened and Endangered Species

Wintering bald eagles are an endangered species, there are no known threatened or endangered plant species. The area of concern is the cottonwood trees used as roosting sites by bald eagles and other bird species. Also these trees provide nesting, feeding and shelter sites for many species of birds.

7. Key Species

The key species (Indian ricegrass, needlegrass & squirrel tail) are currently receiving use in excess of 55%.

8. Clan Alpine HMA & WSA

Currently areas of the Cow Canyon and Dixie Valley Allotment portions of the Clan Alpine HMA are receiving less than 55% annual vegetation utilization. The released horses would be released into the areas of lower utilization, therefore, these released animals would not adversely impact the HMA or WSA.

ENVIRONMENTAL IMPACTS

Impacts of the Proposed Action

Removing Wild Horses

Removing the wild horses from areas outside of the HMA would benefit mule deer and many other species of wildlife. Plant species (Indian ricegrass, needlegrass & squirrel tail) would increase in quantity and vigor helping to meet the management objectives of the Land Use Plans (improve vegetative condition).

Riparian area condition on adjacent State Park administered land should improve after 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 1% 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 would prevent further deterioration of the range due to the wild horse overpopulation. By removing the excess wild horses the remaining population (within the HMA) would allow for a thriving ecological balance between wild horses, wildlife, livestock and vegetation.

Removal of wild horses outside of the HMA would eliminate conflicts between wild horses and privately owned animals.

Releasing Wild Horses.

Based on monitoring data wild horses at the mid-slope portions in the Cow Canyon and Dixie Valley Allotments of the Clan Alpine HMA are not adversely affecting the environment. There is adequate forage and available water.

The action would increase the population of wild horses in the Cow Canyon and Dixie Valley Allotment portions of the HMA by 25 head each. Currently the vegetation in these areas is not being adversely impacted by wild horses and an increase of 25 head would not change the situation.

Since the mares would be spayed or treated with immunocontraceptives they would not accelerate the rate of population increase. It is not anticipated that releasing spayed animals would adversely impact the animals.

The precise impacts of releasing stallions and mares to the social structure of the herd and the behavior of individual animals is unknown, however, because of the small number of animals released it is assumed to be minimal. U.C. Davis analyzed blood taken from wild horses within the Clan Alpine HMA and found no unusual characteristics, therefore, releasing the Lahontan studs would not adversely impact the genetics of the Clan Alpine herd.

The proposed actions would not adversely impact air quality, ACECs, cultural resources, farmlands, floodplains, Native American religious concerns, T&E species, wastes, water quality, wetlands and riparian zones, wild and scenic rivers or wildernesses.

In 1992 Multiple Use Decisions were issued for all of the grazing allotments involved with the Clan Alpine HMA. These decisions allocated the available forage between wildlife, livestock and wild horses. The proposed release of excess wild horses will not change the forage allocation as the numbers of wild horses are below those levels identified in the Multiple Use Decisions for the Cow Canyon and Dixie Valley Grazing Allotments.

Impacts of Alternatives.

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 & squirrel tail) would continue to decline. 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.

Currently the range is deteriorating from the excessive utilization of vegetation caused from the grazing activities of excess wild horses. Therefore, the range is not and would not be in a state of thriving natural ecological balance unless the excess wild horses are removed.

Mitigation Measures.

We do not anticipate any adverse impacts associated with the proposed actions, therefore, mitigation measures are not needed.

CONSULTATION AND COORDINATION

Persons and Agencies Consulted

This environmental assessment and capture plan has been 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 Animal Protection Institute Ann Earle Bobbi Royle Bureau of Reclamation Carson City District Grazing Advisory Board C. Jean Richards Commission for the Preservation of Wild Horses Craig C. Downer Dan Keeiserman Debra Allard Dennis Rechel Fund for Animals Gary Snow Harriman & Son Humane Society of So. NV. **ISPMB** Joyce Casey Kathy McCovey Kent Bros. Lahontan State Recreation Area Life Foundation L-M Ranch Michael Kirk National Mustang Association Nevada Cattlemen's Association Nevada Department of Wildlife Nevada Humane Society Nevada State Clearinghouse Nevada State Division of Agriculture Nevada Land Action Association Paula S. Askew Rebecca Kunow Resource Concepts Steven Fulstone Susan Alder The Nature Conservancy U.S. Fish and Wildlife Service U.S. Humane Society United States Wild Horse and Burro Foundation Wild Horse Organized Assistance

Signatures

Prepared by:

John Axtell Wild Horse and Burro Specialist Lahontan Resource Area	8 May 93 Date
Concurred by:	
Jim/Gianola Wild Horse and Burro Specialist Carson City District	3-10-93 Date
David Loomis Environmental Coordinator Carson City District	3-10-93 Date
Dan Jacquet ADM Resources Carson City District	3/11/93 Date
Karl Kipping Associate District Manager Carson City District	5/7/93 Date

DRAFT

FINDING OF NO SIGNIFICANT IMPACT / DECISION RECORD

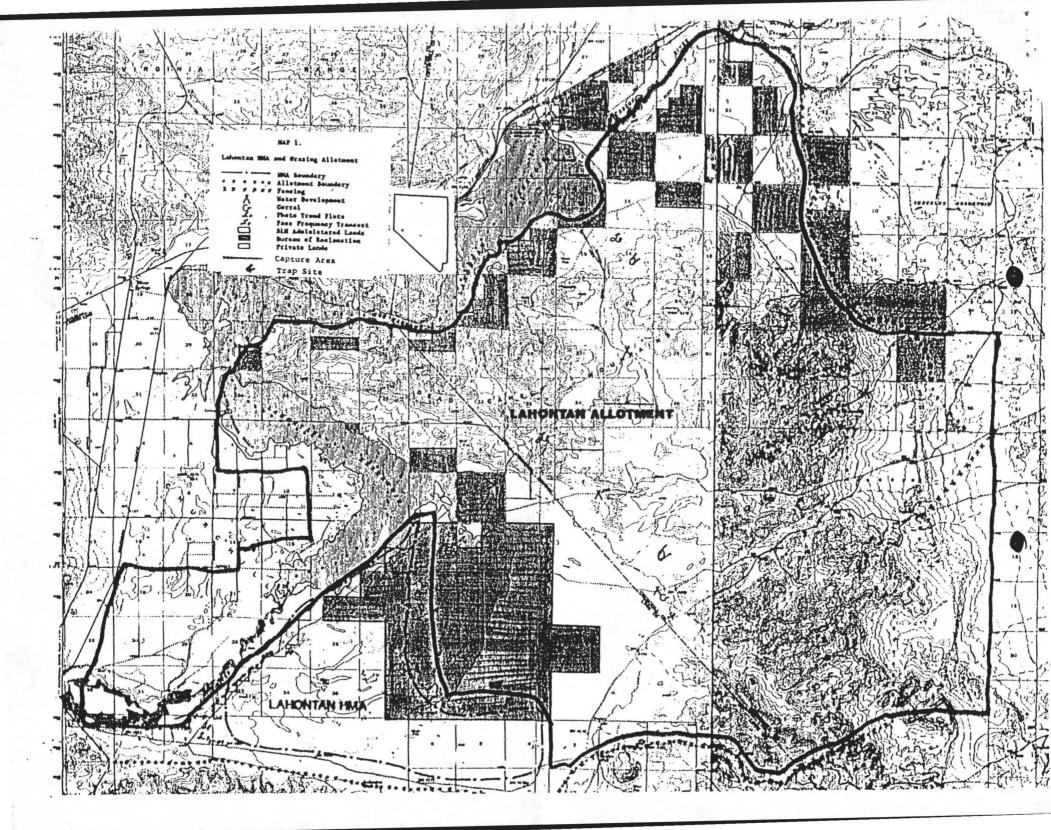
For EA # NV03093023

<u>Finding of No Significant Impacts</u>: Based on the analysis of potential environmental impacts contained in the attached environmental assessment, it was determined that impacts are not expected to be significant and an environmental impact statement is not required.

Rational for decision: The decision to implement the release of unadoptable wild horses is in conformance with the Lahontan RMP, approved in 1985, and would not adversely impact any of the resources in the Clan Alpine HMA or the Lahontan Allotment. It would prevent adverse impacts to the Lahontan Allotment.

<u>Decision</u>: Based on the EA and FONSI the decision is to remove excess wild horses from the Lahontan Allotment, place the adoptable horses into the "Adopt A Horse Program" and release the unadoptable wild horses inside the Clan Alpine HMA and possibly several HMA's within the Walker Resource Area.

James M. Phillips	Date
Area Manager Lahontan Resource Area	
Approved:	
James W. Elliott	Date
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STATE OF NEVADA



COMMISSION FOR THE PRESERVATION OF WILD HORSES

Stewart Facility
Capitol Complex
Carson City, Nevada \$9710
(702) 687-5589

June 11, 1993

Mr. James Elliot, District Manager Carson City District Bureau of Land Management 1535 Hot Springs Road, Suite 300 Carson City, NV 89706-0638

Dear Mr. Elliott:

The Commission for the Preservation of Wild Horses protests NV-034-80 due to the fact that no analysis or criteria for the inclusion of alternatives such as fertility control or age and sex manipulation. To our knowledge there has been no policy or quidelines developed, nor has the results of the fertility control project been completed.

We appreciate the evaluation of the areas in which you have listed as possible turn out of aged animals, however we would appreciate having those areas identified in the final document. We understand the necessity of removal from lands in which the landowner has requested removal; we would hope that this request has been requested in writting. There appears to be many animals moving substantial distances from their home ranges due to the drought and winter, and request that prior to removal you case.

Thank you for your consideration of our comments and the opportunity to provide our cosncerns.

Most sincerely,

Catherine Barcomb, Executive Director

Rown y Sappin, Commissiones



CATHERINE BARCOMB

COMMISSIONERS

Michael Kirk, D.V.M., ... Chairman

Paula S. Ashew Carson City, Nevada

Steven Fulstone Smith Velley, Nevada

Dawn Lappin Reno, Nevada

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