



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Carson City District Office
1535 Hot Springs Road
Carson City, Nevada 89706-0638
PH: (702) 885-6100



IN REPLY REFER TO:
4700
(NV-032)

MAY 13 1996

Dear Interested Party:

This letter is to inform you of Carson City District's intent to gather and remove wild burros from the Marietta Wild Burro Range. This action is in accordance with the Marietta Herd Management Area Plan (HMAP), Environmental Assessment and Record of Decision dated July 6, 1987 and the Marietta Wild Burro Removal Plan, Environmental Assessment and Finding of No Significant Impact dated September 30, 1987. A review of these documents indicates that all pertinent actions and environmental effects remain the same.

The Marietta HMAP and Record of Decision established a population level of 85 burros with the lower and upper limits set at approximately 70 and 100 burros, respectively. On June 22, 1995, an aerial census was conducted and 95 wild burros were counted. Combined with one year's population increase, the current population is estimated to be in excess of 100 head.

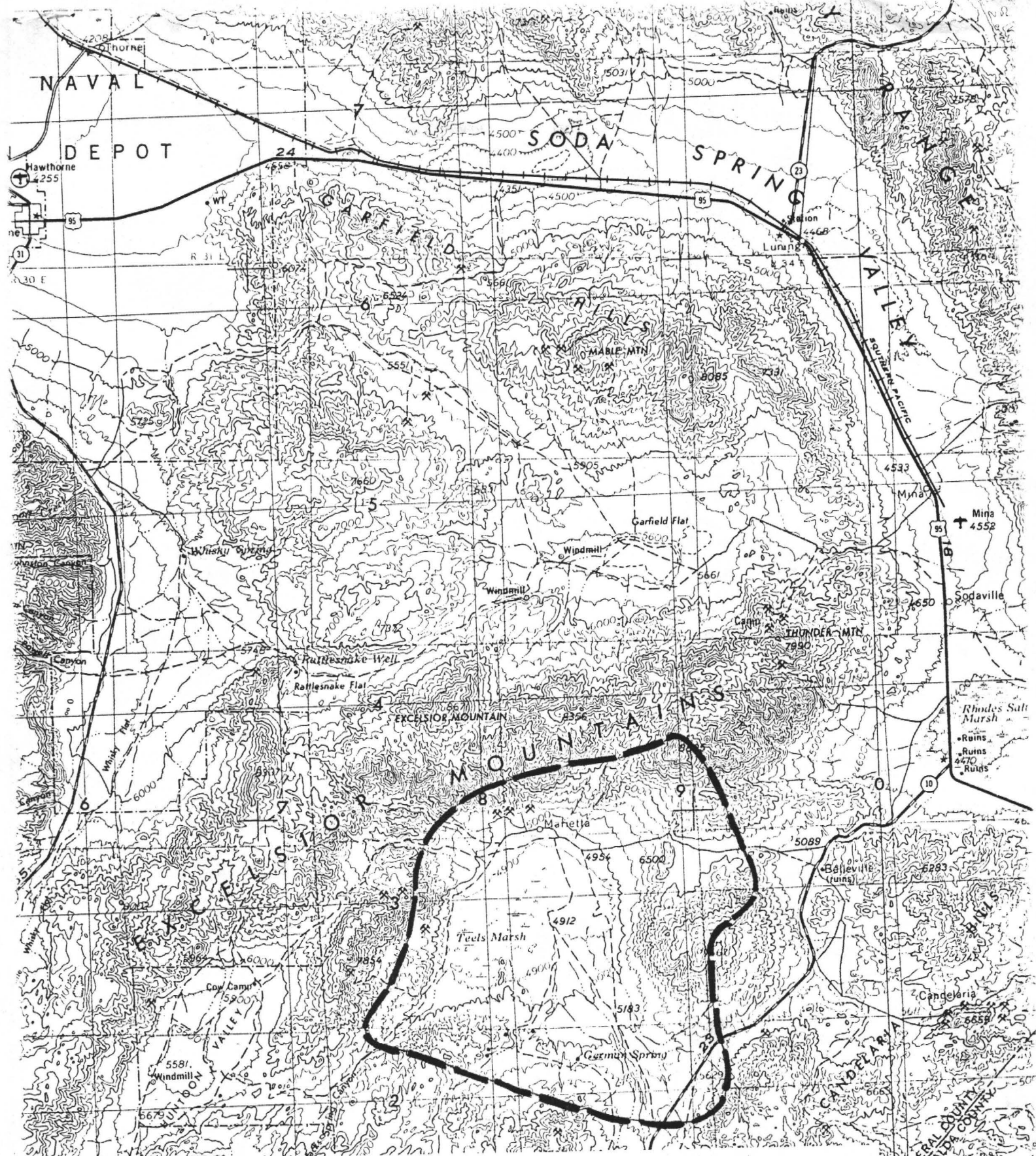
The Carson City District plans to remove approximately 30 wild burros from the Marietta Wild Burro Range beginning about the middle of June, 1996, and lasting approximately one week. The burros will be herded into wing traps by Bureau personnel on horseback. Burros will only be roped if it is necessary to capture an orphaned foal or a suspected wet jenny. In all other cases, when it is determined by on-site Bureau personnel that animals must be roped, the roping will only proceed after consultation with the District Manager. All Bureau guidance and procedures for gathers will be complied with to insure the safety of the animals and personnel involved. The burros will be transported to a Bureau adoption facility.

Any questions or concerns about this gather should be directed to Richard Jacobsen, Wild Horse and Burro Specialist, at this office (702/885-6000).

Sincerely,

John O. Singlaub
District Manager
Carson City District

Enclosure: Marietta Wild Burro Range Map



MARIETTA WILD BURRO RANGE

MINERAL COUNTY
EMERALD COUNTY



COMMISSION FOR THE
PRESERVATION OF WILD HORSES

255 W. Moana Lane

Suite 207A

Reno, Nevada 89509

(702) 688-2626

May 31, 1996

Mr. John Matthiessen
Walker Resource Area
Bureau of Land Management
1535 Hot Springs Rd., Ste. 300
Carson City, Nevada 89706-0638

Subject: Protest - Marietta Burro Gather - 96300171

Dear Mr. Matthiessen:

The Commission for the Preservation of Wild Horses has reviewed the proposed gather of wild burros from the Marietta Wild Burro Range. The "Marietta Wild Burro Herd Management Area Plan" established the limiting criteria to determine the appropriate management level for this burro herd. According to this resource activity plan, key management areas, key forage species, herd age class, herd sex ratios and herd recruitment rates were all criteria to determine the actual herd in the future. As an initial herd, 85 burros were left in 1987 or 1988 for intensive monitoring and evaluation by the District.

We protest the notice of intent to gather wild burros without the evaluation of nine years of rangeland and herd monitoring data. An appropriate management level for this herd is essential to overcome the observed severe overgrazing in the late 1980's and assure that a viable or health herd will sustain itself on the Marietta Wild Burro Range.

It would be appropriate to prepare environmental assessments for any future decision or gather plan affecting this herd.

Sincerely,

A handwritten signature in cursive script that reads "Catherine Barcomb".

CATHERINE BARCOMB
Executive Director

6/20/96 Latty & Roy
TH. FRI
Rm

TOIYABE CHAPTER OF THE SIERRA CLUB PO Box 8096 Reno, NV 89507

June 20, 1996

John O. Singlaub, Manager
BLM/Carson City District
1535 Hot Springs Rd.
Carson City, NV 89706

COPY

Dear Manager Singlaub,

In May, I received a copy of a wild burro capture notice from your office for the Marietta Wild Burro Range. I have been in the area twice this year and not observed very many burros. The Sierra Club is concerned with this proposed capture for 2 reasons:

- It is in an area for which there is an experimental restoration and rehabilitation proposal by a livestock permittee. It seems premature to remove the burros which the experiment is intended to benefit.
- I cannot find my copy of the Marietta Herd Management Area Plan, but I recall that the BLM is supposed to be collecting extensive monitoring data on this small herd of burros. This included both vegetation data and data on the burros themselves. In addition, your letter cites a review of two nearly 10 year old documents on the burros which determined "...all pertinent actions and environmental effects remain the same." I would like to see a copy of the vegetation and burro data collected since 1987 as well as a copy of the BLM "review" with conclusions, apparently based on this monitoring data.

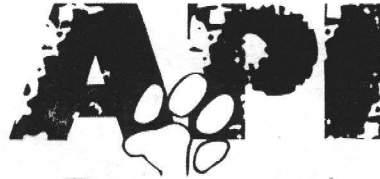
Thank you for considering our concerns.

Sincerely,

/s/

Rose Strickland, Chair
Public Lands Committee

CARSON City



ANIMAL PROTECTION INSTITUTE
OF AMERICA

May 16, 1996

COPY FOR YOUR
INFORMATION

John O Singlaub
District Manager
BLM
1535 Hot Springs Road
Carson City NV 89706-0638

*we need to visit
the State Director, this
is outrageous. Should you
(or other) call a keno meeting?
The Secretary has totally abandoned
wild horses.
NW*

Dear Mr. Singlaub:

We appreciate this opportunity to speak on behalf of the wild burros of the Marietta HMAP in response to your PROPOSED action to remove burros from this HMA. As you ought to know setting an arbitrary number as a management objective for wild horses and burros violates the protection law, the Dahl v Clark federal ruling, the IBLA order, and the GAO findings.

The law requires that a removal be based on monitoring the impact of the horses or burros on the current range condition inventory and other information spelled out by IBLA in a series of rulings. A nine year old assessment of the range conditions cannot possibly meet the criteria of current. The law also allows BLM to remove only the number of horses needed to restore the thriving and natural ecological balance. This is synonymous with the allowable forage take off which is the pre-set management number (percent) that is monitored.

There is no way we can accept your announcement of the roundup as meeting the administrative procedures imposed by law or the protections granted to wild horses and burros by law. To disregard the mandate of Congress and federal laws is a gross betrayal of the public trust and abuse of power by the federal agency. We know that you, as the District Manager, act under the orders of the State Director and the Secretary with regard to the policies you follow and that you do not make up your own laws on your own initiative. This is not a personal criticism of you. We hope to convince the State Office or the Secretary to reverse this policy and stop this removal until the proper supporting data is submitted to the public for public comment.

FOR THE ANIMAL PROTECTION INSTITUTE

Nancy Whitaker
Nancy Whitaker
Public Land Wildlife Division



May 18, 1996

John O. Singlaub
District Manager
BLM
1535 Hot Springs Rd, Ste 300
Carson City, NV 89706-0638

Dear Mr. Singlaub:

In answer to your questions about how BLM can serve the public, we say implement the law and fulfil your mandate to regulate and control livestock use.

How can BLM improve service to the public?

Bring the forage allocation on livestock permits into line with available livestock AUMs and authorized use (using suitability criteria to determine livestock AUMs).

What can we do to improve or maintain the health of the land?

Identify the cause of overgrazing and stop using wild horses as scapegoats to appease and placate livestock owners. In the case of wild horses and burros compare use pattern mapping with wh/b distribution mapping and livestock distribution to identify cause. Use that data to remove only the number of horses/burros needed to restore the Allowable Utilization Level, reduce livestock accordingly.

How can we change the way we do business in light of increasing and competing demands for public land resources?

Change your image from one of doing business with customers to one of policing overuse and abuse by full implementation and enforcement of laws. Respect the professional integrity of your field staff to make sound technical decisions as an interdisciplinary team, render technical decisions fully supported by field data, and not political decisions whitewashed with doubletalk. Stop rubber stamping FONSI's into a meaningless ritual. When you quote law do not misquote with the use of "..." deletions of significant clauses in order to twist the meaning and intent of the law. End the deception of inactive AUMs on the permit. Restore, improve or maintain the condition of the land at the seral stage of most abundance (e.g., broadest diversity) and control human use of **renewable** resources at a level that can be sustained in perpetuity. Assert deferred water rights for public land wildlife, wild horses, and habitat enhancement. Stop trying to please and appease by toadying and ingratiating the goodwill of manipulative exploiters and profiteers. Enforce trespass violations. End temporary nonrenewables. Strictly control turn out and take off times in keeping with the growth season; require guarded lambing and calving as a condition on the permit, require herding (create an Ameri-corp program of range herders responsible to BLM and available to ranchers) to avoid livestock congregating at water sources. End the use of **nonrenewable** resources.

continued . . .

What is my vision of the future of public lands?

API has not formulated a vision. My personal hope would be that the generation of my grandchildren's children will live in a Nation where there remains a frontier of undeveloped lands with diverse plants and grasses abundant with wildlife including wild, free-roaming horses and burros, clean flowing rivers abundant with fish, and ridge after ridge of remote areas sparsely populated with small ranches and fully controlled and guarded herds of sheep and cattle and with many campgrounds to accommodate visitors who come to experience a challenged lifestyle harmonized with the forces of Nature. I see this as an attainable goal.

However, my own vision based on the way things are going is a vast wasteland of overgrazed areas, dry washes and scoured canyons, fenced seedings surrounded by urban sprawl intermittent with gargantuan gold mines and oil/gas drilling rigs dotting the hills, and little islands of private lands where weekend ranchers play cowboy amid token areas of cheatgrass where overhead monorails allow the tourists to see a token population of wild horses and other wildlife species. BLM's job will be as tour guides herding people from slides shows to videos of what once was and could have been.

What should your new District Agenda look like? (This should ask what your priorities and commitments should be for the next ten years before the next permit renewal sham)

Stick to a time frame for monitoring and inventorying, evaluation, and adjustments that is workable and realistic. Include all grazing animals in an integrated, coordinated grazing management program as the multiple use of the vegetative resource. Throw out Jamison's Strategic Plan for Wild Horses and Burros. End selective removal and go back to random gate cut.

Use the AUL to manage for the thriving natural ecological balance. Do not set management numbers for animals (livestock or wild horses)--both are to be the outcome of monitoring impact and inventorying current condition. Set the percent of the annual growth allowed as forage take off as a resource management objective. Set that percent in accordance with the change required to bring the existing range condition to the desired seral stage condition and to reverse trends where needed.

Invoke the temporary closure to livestock regulation within HMAs as the option to wild horse removals.

FOR THE ANIMAL PROTECTION INSTITUTE


Nancy Whitaker
Public Land Wildlife Division

MAY 11 1996



United States Department of the Interior

TAKE
PRIDE IN
AMERICA

BUREAU OF LAND MANAGEMENT

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

IN REPLY REFER TO:

May 13, 1996

Dear Public Land User:

By now I hope you have had a chance to read our District Newsletter, "50th Anniversary Celebration Edition." The purpose of the newsletter was to inform you of ongoing projects, opportunities and activities in the District and to seek your assistance in assessing how well we are doing our job. We would also like to get your thoughts on what direction you think we need to go. Your ideas will be used to develop a vision of the future for the Carson City District that will be incorporated into a new District Agenda.

Please take the time to reflect on the management of your public lands and share your vision with me. Some of the questions we need your ideas on include:

- * How can we improve service to the public?
- * What can we do to improve or maintain the health of the land?
- * How can we change the way we do business in light of increasing and competing demands for public land resources?
- * What is your vision of the future of public lands?
- * What should our new District Agenda look like?

Please write to me c/o BLM, 1535 Hot Springs Road, Carson City, NV 89701 or call me at (702) 885-6000.

Sincerely,

John O. Singlaub
District Manager

MAY 16 1996



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John O. Singlaub
District Manager
Carson City District

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