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Copies to: David R. Belding
Turrent
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 along 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 protect wild horses and burros, as well as to manage and control them, and we will oppose the removal of the following:

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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 RL 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 other many 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

areas shown were exclusively low areas.

herd area

The BLMs of process the area
used in 1971 MFP (URA)

(oversight)