OPTIONAL FORM NO. 10
JULY 1973 EDITION
GSA FPMR (41 CFR) 101-11.6

UNITED STATES GOVERNMENT

Memorandum

8500
(N-043)

TO : Manager, Egan Resource Area

DATE: April 8, 1980

FROM : Wilderness Specialist

SUBJECT: Proposed Buck-Bald Wild Horse Gathering

The proposed Buck-Bald horse gathering involves an area which includes a review unit presently in the intensive inventory phase of the wilderness program in the Ely District. This is: NV-040-034, Buck Mountain.

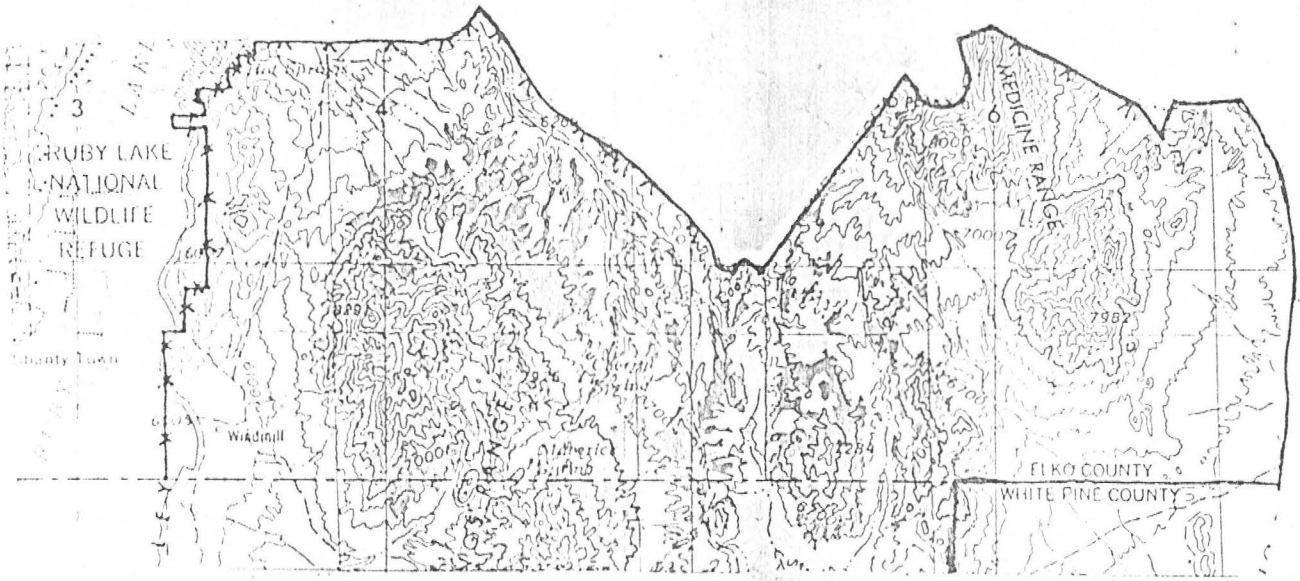
After a review of the proposed action and its impact on wilderness values, it is recommended that the action be allowed with the following restrictions on operations within intensive inventory areas:

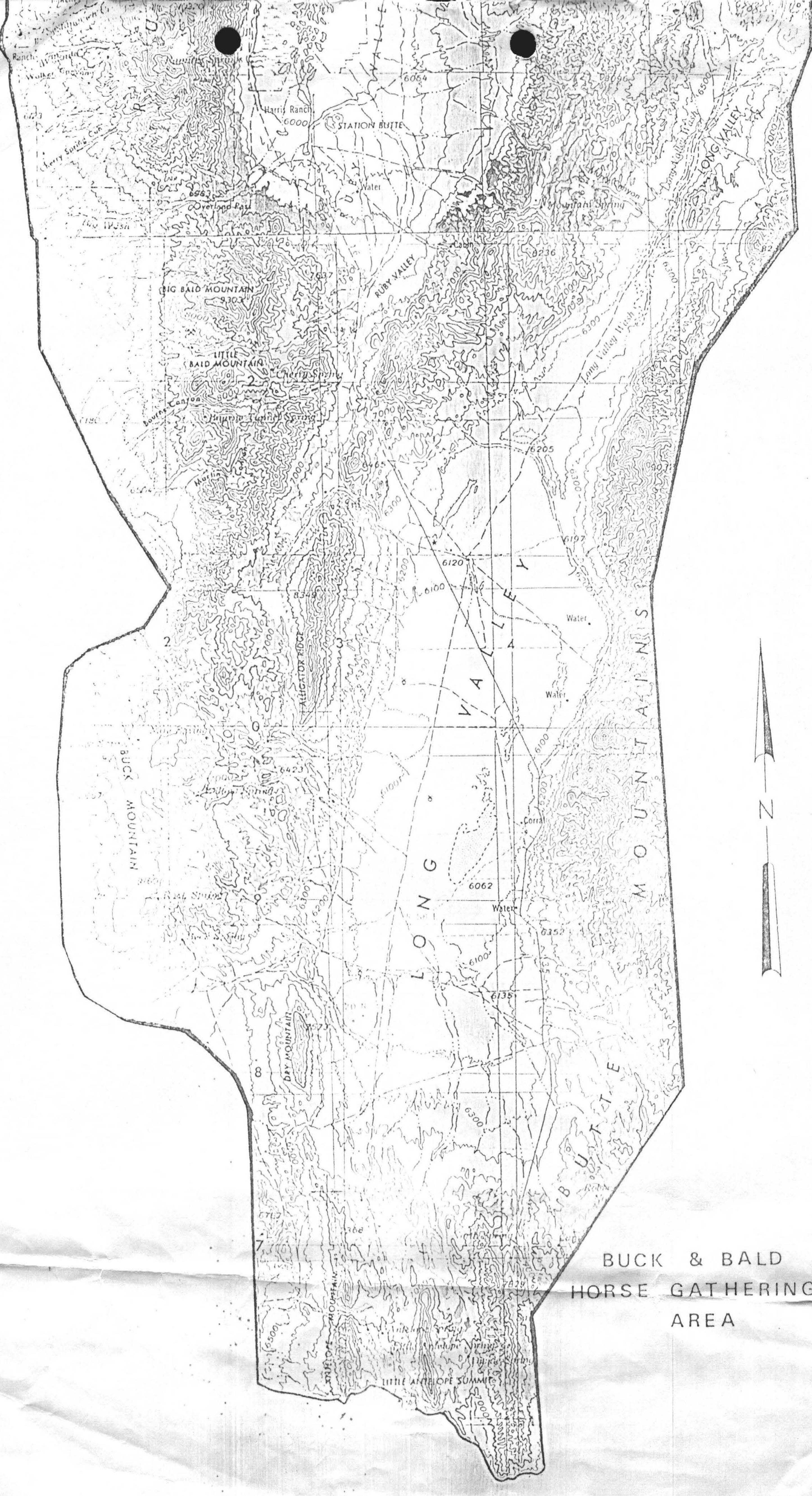
1. All ground vehicular operations take place on existing roads and ways.

2. All traps be of a temporary nature.

Buy U.S. Savings Bonds Regularly on the Payroll Savings Plan

ELKO COUNTY AREA IN THE BUCK-BALD HORSE GATHER

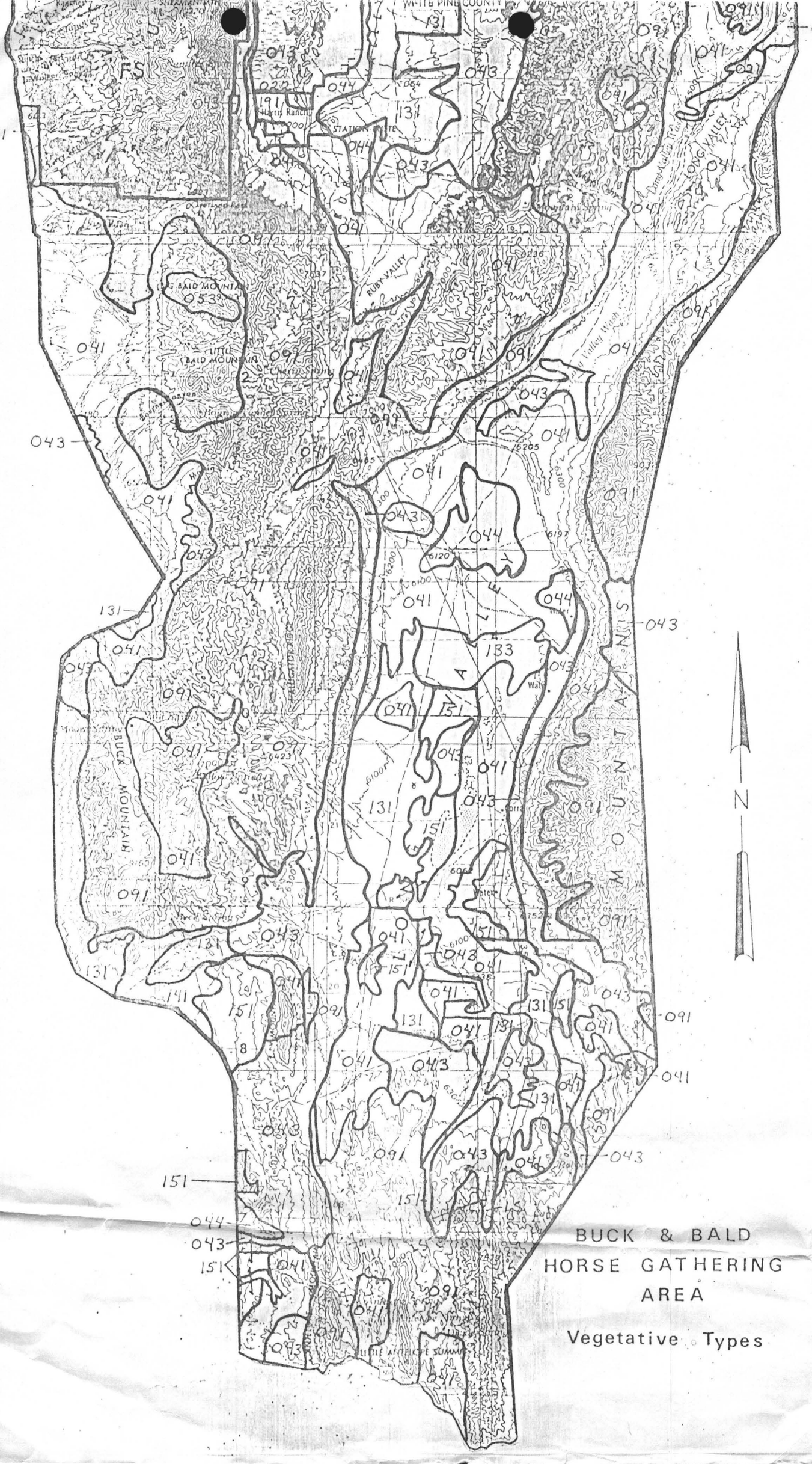




BUCK & BALD
HORSE GATHERING
AREA

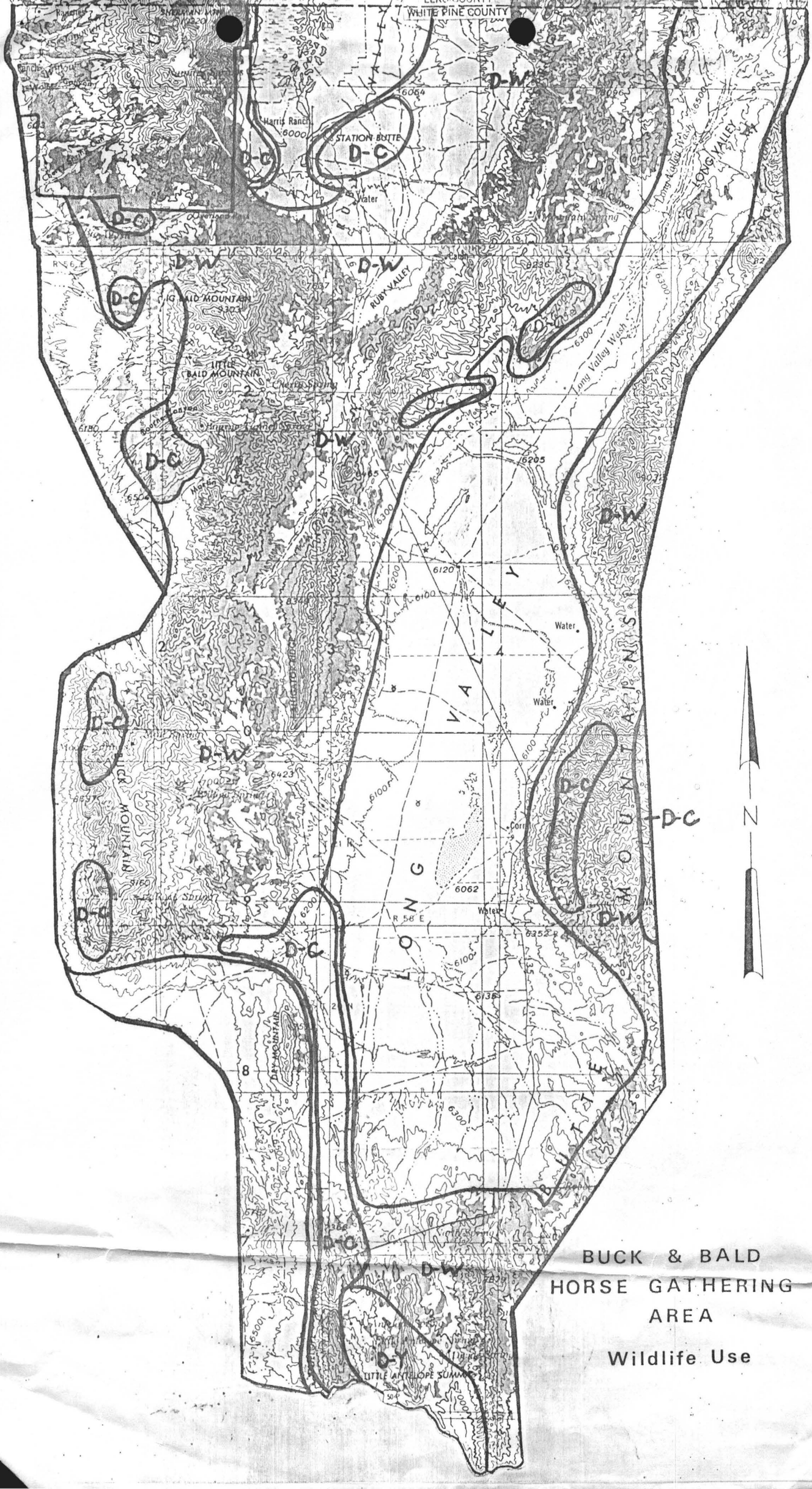
VEGETATIVE TYPES

012	Bunch Grasses
041	Big Sages
043	Mid Sages
044	Gray Rabbitbrush
091	Pinyon-Juniper
131	Shadscale
141	Greasewood
151	Winterfat


BUCK & BALD
HORSE GATHERING
AREA
Vegetative Types
N
BUCK MOUNTAIN
LITTLE BALD MOUNTAIN
BALD MOUNTAIN
RUBY VALLEY
LONG VALLEY
SUMMIT
WHITE PINE COUNTY
FS
041
043
044
091
131
151

WILDLIFE USE

D-Y	Deer Yearlong
D-W	Deer Winter
D-C	Deer Crucial Area
SG	Sage Grouse Sitings
SG-S	Known Sage Grouse Strutting Grounds
BG	Blue Grouse
C	Chukar
BP-N	Possible Birds of Prey Nesting Area (Uninventoried)
MB	Migratory Birds and Shorebirds


WHITE PINE COUNTY
D-W
D-C
STATION BUTTE
Harris Ranch
Water
LONG VALLEY
RUBY VALLEY
BIG BALD MOUNTAIN
LITTLE BALD MOUNTAIN
Long Valley Wash
Water
Water
Water
LONG VALLEY
BUTTE MOUNTAINS
BUCK MOUNTAIN
DEL MOUNTAIN
LITTLE ANTELOPE SUMMIT
R 58 E
N
BUCK & BALD
HORSE GATHERING
AREA
Wildlife Use

4742
(N-043)

G

4/1980

NV-040-0-20

BUCK-BALD HORSE GATHERING

ENVIRONMENTAL ASSESSMENT RECORD

County	Planning Area	Status
White Pine	Cherry Creek	MFP Completed

2640
33
7920
7920
7920
87,120

33 Townships

Prepared by:

Richard D. Howard, Range Conservationist

660 x 660
660
39600
60

No problem.

Inventory 1973

1. guarantee livestock will not be activated

12
125,000
12000
2500
24000
1800
1200

237
145
92.

DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

Background

The Buck/Bald Mountain - Long Valley areas of White Pine and Elko Counties in Nevada have a large population of wild horses and trespass branded horses which is recognized by resource specialists to be in excess of present grazing capacities. This area involves land administered by the Ely District and Elko District of the BLM with wild, free-roaming horses intermingled with trespass branded horses. The area has historically provided important wildlife habitat, and has been subjected to heavy livestock, wild horse and trespass branded horse use. Currently increased mining activities and seismic exploration are taking place in the area, decreasing the usable habitat for the above mentioned animals. Observations over recent years by qualified Bureau of Land Management field personnel have resulted in growing concerns of general range deterioration combined with steadily increasing and unmanaged horse populations which reside in the subject area on a yearlong basis.

observation? utilization? trespass? active use.

indicated deer had not increased since 1974!?

fecal

Another factor complicating wild horse management in this area is that domestic horses have been released in the area. Also, it appears that colts are being caught, branded, and released. It is not uncommon to see branded colts following unbranded mares. Bureau personnel check this area regularly for unlawful harrassment of wild horses however as of this date not enough evidence has been collected to file charges against anyone.

During the 1974 claiming period, five individuals claimed 1,117 horses; of the total claim, 940 horses were actually removed. This figure does not include progeny. See attached appendix 1 for figures on claims, and added background information.

indication of livestock illegal use.

Fund restriction and wide-spread controversy regarding wild horse manipulation have generally complicated this aspect of habitat management. The proposed project area is starting to come into the limelight since it contains a critical deer wintering area.

Proposed Action

The Egan Resource Area, Ely District and Wells Resource Area, Elko District, Bureau of Land Management, propose to gather an estimated 400 to 500 excess wild and/or privately owned horses using a helicopter and portable wing traps beginning on or about July 16, 1980. Gathering operations may be conducted over an 18 month period and may include gathering during two or three separate time periods to reduce horse herds to a more manageable level of approximately 800 horses.

?

The proposed gathering operations would be conducted from the east boundary of the Ruby Lake National Refuge and extend east to the middle of Butte Valley in Elko County and extend four (4) miles

639

AUMS
deer 13,540
horses 15,031 42,220 AUMS
livestock
horses 14,430

36.37%

not increased deer herd-

to ten (10) miles from the Elko-White Pine County line north in Elko County (see map No. 1) In White Pine County, the area extends from the Elko-White Pine County line south to U.S. Highway 50; the eastern boundary would be the crest of the Butte Mountains and extend west to the eastern side of Newark Valley (see map No. 2). The roundup will be concentrated in the Maverick Springs Range within the gather area in order to capture as many branded horses as possible.

Temporary traps with deflector wings encompassing less than one acre would be constructed. The use of a contracted helicopter and horse wranglers would be necessary to drive and direct horses in a careful and efficient manner. Hazards such as cliffs, fences, and old mine shafts would be scouted in advance and existing roads and trails would be used. Wild horses would be transported by truck to temporary holding facilities in Palomino Valley, Nevada, and/or Delta, Utah for adoption processing, then shipped to distribution centers in the midwest for adoption. Horses that might be held at the trap site in excess of 12 hours would have food and water provided. Branded trespass horses and their current year's foal would be impounded and held until trespass fees, gathering fees, and associated costs are paid to the Bureau, and then would be turned over to the owner(s). Other branded horses not claimed will be treated under the Nevada State estray laws.

The proposed action is considered an "interim measure" to assist in control of habitat over-utilization pending completion of mandated Grazing Environmental Impact Statements and formal vegetative allocations which will not be fully implemented until after 1985.

Alternatives

Different methods of capturing wild horses are discussed in the capture plan (attached) and will not be discussed in the alternatives section of this assessment.

The three main viable alternatives to the proposed action are removal of 800 horses, only trespass branded horses and the no action alternative.

Alternative 1 - Removal of 800 horses over an 18 month period from July 15, 1980 to January 15, 1982

This alternative would constitute a 67 percent reduction of horses in the gather area and approximately 400 wild horses would be left at the completion of all gathering operations. The initial gathering operation would be conducted this summer, with the removal of an estimated 400 horses and other gathering operations could be conducted as funds become available for this purpose. These operations would be subject to the stipulations and mitigating measures of the proposed action plus the following additional stipulations and mitigating measures.

a) Priority will be given to gathering in areas where trespass branded horses are concentrated.

b) No gathering operations would be conducted during the foaling and breeding seasons, from March 1, 1981 to July 15, 1981, or under any situation that would create undue stress on horses.

c) Wild horse groups and public will be notified before any gathering operations take place.

d) Priority will be given to avoid winter gathering in heavy deer concentration areas when deer use is high.

The major advantages to this alternative are:

a) Allow planning for management of wild horses.

b) Competition for existing resources would be substantially alleviated.

The major disadvantages to this alternative are:

a) The magnitude of this proposal may offend people who want to see more wild horses left in the area.

b) Horses may be subject to additional stress of more gathering operations.

Alternative 2 - Removal of Trespass Branded Horses

There are an estimated 175 trespass branded horses in the proposed gathering area. Removal of these horses would provide temporary relief by leaving only wild horses in this area.

The major advantages to this alternative are:

a) Eliminate management problems concerning wild horses being mixed with trespass branded horses.

b) Allow planning for management of wild horses.

The major disadvantages to this alternative are:

a) It would require excessive handling of both wild and trespass horses, making injury to horses and people more common.

2 0 b) The cost factor would be higher per horse captured.

c) Over-utilization of range resources would still be occurring, resulting in further range degradation.

d) Competition between horses and other animals would still be excessive.

Alternative 3 - No action

Under the "status quo" alternative, no horses would be gathered.

Major Advantages of this Alternative

a) Funds alloted for this roundup could be diverted to other roundups in the state of Nevada.

b) Horses would be left alone.

Major Disadvantages of this Alternative

a) Management problems concerning wild horses being mixed with trespass branded horses would become more complicated and complex.

b) Planning for management of wild horses would be set back indefinitely.

c) Over-utilization of range resources would increase.

d) Competition between horses and other animals would continue to be excessive.

DESCRIPTION OF THE EXISTING ENVIRONMENT

Nonliving

The subject area is rural in character. Topography consists of valley floors, alluvial fans, canyons, mountains, steep ridges, and basins. Annual precipitation varies from 20 inches in higher elevations to 8 inches or less at the lower elevations. The bulk of the precipitation occurs through early spring rains and winter snows. Temperatures range from summer maximums in excess of 90 degrees F. to winter lows falling well below zero.

Air quality is good, although short-term increases in fugitive dust levels occur as the result of climatic variations and vehicular traffic.

Soil textures are generally loams, clay loams, and silt loams, most of which are capable of supporting desirable species of vegetation. The following table depicts soil characteristics:

General Distribution	Principal Soil Orders	Soil Productivity	Erosion Susceptibility
Mountains	Mollisols	Moderate-high	Moderate
Benches and Alluvial Fans	Aridisols	Moderate	Moderate
Valley Floors	Aridisols and Entisols	Low	Slight

Springs, reservoirs, wells, and intermittent streams provide an adequate water supply of generally fair to good quality. Competition by large animals (wildlife, horses, livestock) for use of the water is a threat to future maintenance of water quality as evidenced by excessive trampling of undeveloped springs, seeps, and wet meadows.

Living Components

Major plant associations may be generally characterized as big sagebrush-grass, mid sagebrush-grass, pinyon pine-juniper, winterfat-saltbush flats. For more detailed information see attached map of vegetative types.

The dominant shrub in the big sagebrush-grass community is big sagebrush (Artemisia tridentata). Other shrubs of this type occurring are greasewood, (Sarcobatus Vermiculatus); gray rabbitbrush, (Chrysothamnus nauseous); at higher elevations Utah serviceberry, (Amelanchier utahensis), and bitterbrush, (Purshia tridentata). Common forbs include buckwheat, (Eriogonum spp.), princess plume, (Stanleya pinnata); mustards, (Brassica spp.), and lupine, (Lupinus spp.). Common grasses include great basin wildrye, (Elymus cinereus); western wheatgrass, (Agropyron smithii); Sandberg bluegrass, (Poa secunda); bluebunch wheatgrass, (Agropyron spicatum); Indian ricegrass, (Oryzopsis hymenoides); squirreltail, (Sitanion hystrix); and where perennial grasses have been over utilized or removed by fires, cheatgrass, (Bromus tectorum) has become the dominant understory.

The dominant shrubs in the mid-sagebrush-grass are low sagebrush, (Artemisia arbuscula) and black sagebrush, (Artemisia arbuscula nova). Black sagebrush occurs more frequently than low sagebrush in this area. Other common shrubs occurring in this type are little rabbitbrush, (Chyrsothamnus viscidiflorus); shadscale, (Artiplex confertifolius); winterfat, (Ceratoides lanata); and Mormon tea, (Ephreda nevadenis). Common forbs in this type are mustards, (Brassica spp.); buckwheats, (Eriogonum spp.); locoweeds, (Oxytropsis spp and Astragalus spp.) Pepper weeds, (Lepidium spp.) and penstemon, (Penstemon spp.) Common grasses include western wheatgrass, (Agropyron smithii); Sandberg bluegrass, (Poa secunda); Indian ricegrass, (Oryzopsis hymenoides), and squirreltail, (Sitanion hystrix).

Pinyon pine-juniper type occurs on valley benches and extends into the higher elevations. The pinyon pine, (Pinus monophylla) and Utah juniper, (Juniperus osteosperma), are the dominant overstory. Understory plants include segments from the big-sagebrush-grass and mid-sagebrush-grass communities. Other shrubs occurring in the pinyon pine-juniper type not already listed are curlleaf mountain mahogany, (Cercocarpus ledifolius); green Mormon tea, (Ephredra viridis), and snowberry (Symphoricarpos spp.) At higher elevations and where water is at or near the ground surface there are scattered patches of aspen, (Populus tremuloides) in the area.

The fourth major plant association is the winterfat-salt-bush flats. This plant association occurs on the valley bottoms and lower valley

benches. The dominant shrubs in this type are shadscale, (Artriplex confertifolia), and winterfat, (Ceratoides lanata). Other common shrubs in this type are spiny hopsage, (Grayia spinosa); greasewood, (Sarcobatus vermiculatus); budsage, (Artemisia spinescens); kochia (Kochia spp.); little rabbitbrush, (Chyrsothamnus viscidiflorus), and big sagebrush, (Artemisia tridentata). The most common forbs are buckwheats, (Eriogonum spp.), and mustards, (Brassica spps.). The most common grasses are Indian ricegrass, (Oryzopsis hymenoides); squirreltail, (Sitanion hystrix), and sand dropseed grass, (Sporobolus spp.).

Invasions of halogeton, (Halogeton glomeratus); Russian thistle, (Salsola kali), and cheatgrass, (Bromus tectorum) are common where areas have been disturbed by man and/or overgrazed by livestock. Little rabbitbrush has replaced the dominant desirable shrubs in this type where overgrazing has occurred.

There is no past or current record of any threatened or endangered plants in the proposed horse gathering area.

adult/foal

Horses have occurred in this area for many years. They are all descendents of ranch horses that were released in the area and have continued to propagate. It has been documented by Anthony Amaral in his book Mustang, that no horses occurred in the Great Basin prior to settlement by trappers, miners, and ranchers. Aerial census efforts conducted during 1978 and 1980, and BLM estimates indicate approximately 1,200 horses presently reside in the gathering area on a yearlong basis. This compares to approximately 700 to 800 horses in this area in 1978. 350 - f 700 350 1050 525

Horses prefer grasses and grasslike species but they also will utilize shrubs and forbs when necessary. In the subject area, moderate to heavy use by horses and other grazing animals has reduced desirable grasses to the point that only shrubs and less available grasses remain. Shrubs are severely hedged and are being replaced by less desirable and unpalatable species such as halogeton.

Numerous game and non-game wildlife species utilize the subject area on a seasonal or yearlong basis. Game species include mule deer, sage grouse, blue grouse, chukars, several species of ducks, geese, and cottontail rabbits. Non-game species include rodents, reptiles, and amphibians common to the Great Basin, pinyon jays, ravens, hawks, golden eagles, coyotes, badgers, bobcats, and horned larks. A more complete list of wildlife species can be found in the Cherry Creek URA. See attached map with wildlife use areas.

Mule deer are a highly important species. Presently there are an estimated 950 to 1,100 mule deer in the proposed gathering area on a year-long basis. Mule deer food consumption is influenced by seasonal preference, availability and quality of forage. Shrubs such as bitterbrush provide crucial food requirements for mule deer winter

Season of use
migration patt. WH

survival. Forbs and grasses provide important feed in the spring and early summer, but shrubs remain important for cover fawning areas.

Mule deer concentrations are greatest in portions of the proposed gather area where mountain shrub and sagebrush-grass vegetation types are found. Shrubs, especially big sagebrush, antelope bitterbrush, curlleaf mountain mahogany, and Utah serviceberry provide key forage for deer. The use of grass and forbs increases in the spring and summer months. One of the most critical elements is the amount and quality of browse available during winter months. Meadow areas are being lost to gully erosion and lowering of water tables, a direct cause related impact from overgrazing. Riparian areas and high elevation browse stands are declining in condition.

An estimated 11,500 to 12,000 deer winter in the subject area; there is a summer population of approximately 950 to 1,100 deer.

An estimated 700 deer inhabit the Buck and Bald Mountains on a yearlong basis, and an estimated 250 to 400 deer inhabit the Butte Mountains on a yearlong basis.

Livestock (cattle and sheep) use portions of 17 allotments within the gathering area throughout the year. Use by livestock has traditionally been heavy. Use by allotment is shown as follows:

17 livestock allot. % use

% use of 17 allot by WH

5 | 12,000

AUM's Total Active Preference	Current Year in Gather Area: AUM's Active	Current Year in Gather Area: AUM's Nonuse	3-Year Average in Gather Area: AUM's Active	3-Year Average in Gather Area: AUM's Nonuse	Allotment No.	% of Use in Gather Area
9,129 ++	63	29	81	10	0603	1%
90 +++					0604	
90 +++					0605	
23,995 ++++	4,375	19,620	6,487	17,508	0606	
996	* ---	996	---	996	0609	
2,466	* 740	1,726	---	2,466	0610	
10,099 ++	3,013	2,744	2,979	2,777	0611	57%
648 ++	4	3	4	3	0612	1%
278 (Cook) 563 (Wright)	* ---	563	340	223	0619	
1,056	340	716	851	205	0620	
1,500	1,500	---	1,500	---	0621	
17,835 ++	1,113	670	1,557	227	0501	10%
698 ++	4	3	6	1	0502	1%
8,755 ++	310	128	306	132	0503	5%
78,207 ++	11,462	27,198	14,111	24,548	- TOTAL	

Current Year Use: 29.6% Active Use in Gather Area
38,660 AUM's Preference in Gather Area (Ely District)

3 Year Average : 36.5% Active Use in Gather Area
38,659 AUM's (Preference in Gather Area (Ely District)

* Not accurate reflection because operator may be making more use next year, (just acquired the privileges thru transfer).

++ Total Active Preference AUM's outside of the gathering area.

+++ Allotment 0604 and 0605 have been excluded because no horse use occurs in these allotments. They are completely fenced.

++++ AUM Average is two year average.

ELKO PORTION IN GATHER AREA

Total Active Preference	Current Year in Gather Area AUM's Active	Current Year in Gather Area AUM's Nonuse	3 Year Average in Gather Area AUM's Active	3 Year Average in Gather Area AUM's Nonuse	Allotment No.
920	920	---	920	---	Bald Mountain
785	785	---	785	---	Ruby #9
1,864	700	1,164	700	1,164	Maverick Springs Allotment
3,569	2,405	1,164	2,405	1,164	- TOTAL

67% Active Use in Elko Portion of Gather Area

Livestock use has remained fairly consistent over the last three years. The average AUM preference over the last three years in the gather areas (including Elko and Ely Districts) 42,228 AUM's, with about 39 percent of these AUM's taken in active use and 61 percent of these AUM's remaining in non-use. Current year's preference in the gather area (includes Elko and Ely Districts) is 42,229 AUM's with 33 percent of these AUM's being taken in active use and 67 percent remaining in non-use.

Ecological Interrelationships

Ecological interrelationships are complex and diverse. For purposes of this analysis, discussion has been limited to major relationships concerning environmental elements affected by wild horses. Wild horses, as with other large mammals, are selective in their grazing patterns, tending to graze some plants heavily and others not at all. As numbers of horses increase, these areas of overuse become larger, and desirable plants are replaced by undesirable and less palatable species. This is evidenced by the invasion into white sage flats in the gathering area by halogeton and little rabbitbrush. This in turn lowers the carrying capacity for all animals, including horses.

Competition for space, forage and water between livestock, wildlife and wild horses affects survival and reproductive rates of each.

Human Values

Contrasting and varied topography make the gathering area visually pleasing to many people. Major population centers are far removed, the nearest community being Ely, Nevada, which is located 30 miles to the southeast.

Wild free-roaming horses 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, they have educational, scientific, and cultural values to the people of the region and nationally. Local attitudes regarding the presence of wild horses, both generally and in the subject area, are varied. The greatest potential interest in preserving and viewing horses arises from the Reno and Las Vegas areas, and on a national level. It is felt that very little recreational use of horses either by viewing or photography is made by visitors in the area.

Known cultural values (archaeological remains) exist in the general gathering area. Little formal investigation has been conducted within this area; however, potential for evidence of previous human occupation is medium to high.

Lands included within the subject area are in various stages of Wilderness Inventory. The proposed action would have no significant impact on wilderness characteristics (see attached clearance).

There are high recreational values for big game hunting due to large concentrations of mule deer. Limited sage grouse and chukar hunting also occurs.

ANALYSIS OF PROPOSED ACTION AND ALTERNATIVES

Environmental Impacts of the Proposed Action - Remove 400 to 500 Wild Horses

Nonliving Components

Negligible impacts to air quality would occur during gathering operations and handling of horses, resulting from helicopter and vehicle exhaust emissions. Short-term increases in fugitive dust levels caused by operation of ground vehicles and running horses would occur.

Sites which presently exhibit active soil erosion would be positively impacted as would the water quality of sources presently exhibiting severe trampling and resultant contamination through sediment increase and/or fecal deposits in water.

Reduced competition between wildlife, livestock, and horses for water sources would be a high positive impact.

No impact on water quality would result from the horse gathering operation or the handling of horses which would be conducted away from water. Reduced horse numbers would lessen grazing and trampling at waterholes and riparian areas. This would provide a more favorable habitat for all animals.

Living Components

An area less than one acre in size (trap location), would be severely trampled during gathering operations. Vegetative regeneration would be expected within 2-3 years depending on climatic conditions.

It is expected that the intensity of livestock grazing would remain at approximately the same level.

A decrease in the horse population could be expected to have a positive impact on areas which presently exhibit soil erosion or have potential erosion characteristics.

The decreased horse population would have a high positive impact on terrestrial plants over a period of time. The decreased grazing pressure would slow downward trends in overall range condition because of increased vigor and density of desirable perennial plants.

A negative impact on horses would be expected during gathering and handling. This would result from traumatic effects of capturing, trapping, loading and hauling of the animals. Enough horses would remain to maintain a viable herd and provide for interaction between bands. There would be a high positive impact on remaining horses, livestock and wildlife because of reduced competition with horses for available forage. A negligible impact to other terrestrial animals is expected during the gathering process. Other animals could be temporarily frightened or displaced by the increased activity in the area.

A positive impact would be expected for future management of wild horses since the gathering operations would be centered in the Maverick Springs Range where the larger concentration of trespass branded horses are located. Removal of these horses would clarify horse ownership and remove the potential for wild horses being converted to private uses.

Ecological Interrelationships

A decrease in the horse population would result in a positive impact on vegetative succession. By reducing the competition for forage, the more palatable climax and subclimax species would be able to regain their vigor, thus allowing them to remain established. If the climax species remain established, the unpalatable invader species would not become dominant.

Human Values

Should significant archaeological remains be present at the specific location of the trap, damage or destruction could result.

Removal of wild horses would reduce viewing opportunity, and affect those who value horses. Removal of horses will have an economic impact on those ranchers who have trespass branded horses that are

captured, since they will have to pay gathering costs, trespass fees and other associated costs before these animals can be turned over to them. Removal of horses would benefit ranchers by reducing competition for existing forage and eventually the increased forage would provide economic benefits for them.

A potential exists for possible animosity between private horse owners and Bureau personnel.

The entire project area is currently in VRM (Visual Resource Management) interim management class III status. The proposed project will result in a limited and temporary disturbance of soil and vegetation, and a temporary structure on the landscape. Once the portable traps are removed there will be no residual short-term or long-term impacts on the visual resources. Therefore, a visual contrast rating is not necessary for this proposed project.

Recommended Mitigating Measures

(1) Horse handling should be kept to a minimum. Capture and transporting operations are exceedingly traumatic to the animals. Minimizing the handling would increase the safety of the animals, as well as the handlers.

(2) No gathering should be allowed between March 1, 1980 and July 15, 1980 because of the potential stress to pregnant and lactating mares and the possibility of induced abortions. Gathering may be resumed after the foaling period and after foals are grown enough to withstand the stress of gathering operations.

(3) Horses should not be run more than 10 miles during gathering operations and gathering will be done in the early morning and early evening to avoid overheating horses during the hot weather when the first roundup is scheduled.

(4) A veterinarian will be on call during gathering operations.

(5) Helicopters will be used with caution. A qualified district BLM representative will be present during gathering attempts to insure strict compliance with the above mileage limitations and CFR 4700 regulations.

(6) Captured horses that are obviously aged, lame deformed, or sick should be humanely disposed of at the trap site.

(7) Captured horses that are clearly unsuitable for adoption but that do not fall under (6) above, should be collared with identifiable neck bands and released for study purposes.

(8) A cultural resource investigation by an archaeologist or D.A.T. should be made prior to any trap construction. If a significant find is discovered, an alternate trap site should be selected.

(9) Every effort will be made to keep mares and their young foals together. Mares with foals on the ground will be separated from stallions and barren mares before shipping to central BLM facilities at Palomino Valley (Reno, Nevada) and/or Delta, Utah.

(10) Horses will not be held more than 12 hours without food or water (due to hot weather at the time of the roundup).

(11) A BLM law enforcement agent will be present during the gathering operation to provide protection for personnel working on the roundup.

(12) Intensity of livestock grazing in the gather area will remain at approximately the same level until approval of the final grazing EIS.

13) Winter horse gathering operations will take every effort to avoid being conducted in winter deer use areas when deer use is high.

Residual Impacts

Reduced competition for water and vegetation should result in improved plant vigor, condition, and reproductive potential. A sufficient horse population would remain to maintain a viable horse herd.

Relationships Between Short-term Use and Long-term Productivity

The impacts of this proposed action would enhance the environment for a short period of time. Over utilization of forage by uncontrolled horse populations would increase to a degree detrimental to the horses themselves, as well as wildlife and livestock. (It is estimated that horses in this area are increasing at a rate of 13 percent per year.)

Irreversible and Irretrievable Commitments of Resources

None.

Alternatives

(1) Removal of 800 horses.

(2) Removal of Trespass Branded Horses.

(3) No Action.

Environmental Impacts

Alternative 1 - Removal of 800 horses.

Non-Living Components

Reducing the horse population by 800 head combined with maintaining livestock use at approximately the same level would have a positive

impact on soils susceptible to erosion. Gullies and soil compaction would decrease, reducing the loss of soil and decrease water sedimentation and establish a favorable environment for maintaining and increasing the density of preferred and desirable forage plants over a period of time.

Living Components

An initial negative impact would occur to the horses from the stress of the horse gathering operations of this magnitude. Over a period of time with the increase in preferred and desirable forage, the horses, wildlife, and livestock would benefit from the reduced competition for these plants.

The reduced grazing pressure as a result of this alternative would significantly slow the downward trend in overall range condition, and improvement in conditions could be expected sooner than if the proposed action or the other alternatives are accepted.

A very positive impact would be expected for future management of wild horses since emphasis will be given to conducting gathering operations where trespass branded horses are concentrated in larger numbers. The trespass branded horse situation would be virtually eliminated from this area, and the current incidents of using wild horses for private gain would be significantly reduced and possibly eliminated.

Ecological Interrelationships

A positive impact on vegetative succession could be expected from this alternative. The reduced horse numbers combined with maintaining livestock use at approximately the same level would increase the desirable and preferred forage plants' vigor and reproductive capacity. Vegetative succession could be expected to progress to a higher seral stage with undesirable and invader plant species making up a lesser and insignificant portion of the total vegetative cover. This would eventually result in higher productivity and population increase for all animals.

Human Values

There would be a mixed impact on these values. First there would be a negative impact on people who enjoy seeing large numbers of wild horses because of the reduced horse numbers, but these people when observing horses in this area would be compensated by knowing that the horses that are observed are truly wild and free-roaming horses and not someone's trespass domestic horses. The opportunity to harrass and brand wild horses would be significantly reduced and people involved in these illegal activities would reduce or stop these activities because the work involved in capturing horses would be greater than the benefits that could be received. Ranchers in the area would experience economic gain from the increased forage even though it is expected that livestock use will not increase. This economic benefit

would result from increased pounds of gain per animal, and increase value of the AUM's as the forage condition and quality improves.

Recommended Mitigating Measures

Same as the proposed action and the four additional measures listed under this alternative on pages 2 and 3.

Residual Impacts

Wild horse populations though reduced, would have the opportunity to increase without decreasing the quality and quantity of available forage, and virtually free from illegal horse gathering operations.

Relationships Between Short-Term Use and Long-Term Productivity

The impacts of this alternative would enhance the environment for a longer period of time at least until the court mandated grazing EIS is completed and vegetative allocations can be made. Forage resources would be given the opportunity to increase and improve in quality without being over grazed by livestock and horses. Wild horses though reduced initially would be able to increase without over grazing desirable vegetation and without being harrassed by illegal mustangers. Wildlife would benefit from eventually improved habitat conditions and decreased competition for existing resources.

Irreversible and Irretrievable Commitments of Resources

None.

Environmental Impacts

Same for Alternatives 2 and 3.

Non-Living Components

Uncontrolled horse populations combined with wildlife and livestock use would have a negative impact on soils susceptible to erosion. Gullies and soil compaction would increase, causing not only loss of soil but increase water sedimentation and increase loss of preferred and desirable forage plants.

Living Components

A negative impact on vegetation and animals is anticipated under these alternatives. Uncontrolled horse numbers would increase to the point that most available forage would be utilized to the detriment of livestock, wildlife, and the horses themselves.

Livestock operators are using less than half of their total preference but horses are making the balance of AUM's used over 50 percent. This is not a major problem, but the main problem is that horses concentrate

in preferred forage areas yearlong and tend to overuse them, moving only when climatic conditions force them to move to other areas. This makes the competition for the forage in these areas severe with wildlife and livestock. Wildlife (mule deer) have controls placed on their population levels; livestock are regulated by numbers, season of use and area of use. But at present horses do not have any active controls on their population and the continued growth and expansion of their numbers will make excessive demands on the vegetative resource.

Ecological Interrelationships

A negative impact surrounding vegetative succession should be anticipated from these alternatives. The uncontrolled horse numbers combined with livestock and wildlife use would have a continuing adverse effect on the dominant desirable vegetative species. Continued heavy grazing of preferred forage plants would cause continued loss of plant vigor and reproductive capacity. Vegetative succession would regress to a lower seral stage with undesirable forage species making up a greater portion of the total vegetative cover. This would ultimately result in lower productivity and population decline for all animals.

Human Values

There would be greater opportunity to view horses through steadily increasing populations. But an increased die-off of wild horses would offend many people's values. Also, certain individuals would have increased opportunities to brand and harass wild horses, using them for their private gain. Ranchers in the area would experience a severe economic impact through the loss of forage and AUM's from the increasing horse population.

Recommend Mitigating Measures

None

Residual Impacts

Wild horse populations would continue to increase, resulting in further deterioration of vegetation and reduced carrying capacities.

Relationship Between Short-Term Use and Long-Term Productivity

Continued overuse would result in the eventual loss of soil and desirable plants through erosion and a general lowering of productivity of habitat on a long-term basis.

Irreversible and Irretrievable Commitments of Resources

Continued overgrazing of the forage resources would result in wind and water erosion of unprotected soils. The soils removed from hills and mountainsides by erosion constitutes an irretrievable resource loss.

PERSONS, GROUPS, AND GOVERNMENT AGENCIES CONSULTED

Nevada State Grazing Board No. 4 - Ely, Nevada

Nevada State Department of Wildlife - Ely, Nevada

International Society for the Protection of Wild Horses and Burros - Reno, Nevada

Wild Horse Organized Assistance, Reno, Nevada

American Horse Protection Association, Washington, D.C.

American Humane Association, Denver, Colorado

Animal Protection Institute, Sacramento, California

U.S. Humane Society, Washington, D.C.

Fund for animals, Salt Lake City, Utah

National Mustang Association, St. George, Utah

National Wild Horse Association, Las Vegas, Nevada

Wild Horse and Burro Committee for National Academy of Science, Logan, Utah

Nevada Division of Forestry

Nevada Division of State Parks

Nevada Division of Environmental Protection

Nevada Department of Wildlife

Mr. Craig C. Downer, P.O. Box 456, Minden, Nevada 89423

Elko District, Bureau of Land Management, Elko, Nevada 89801

INTENSITY OF PUBLIC INTEREST

Local Newspapers in both Ely and Elko have long been critical of the Bureau of Land Management wild horse management program. A series of articles and one editorial in the Ely Daily Times in October of 1978 focused on problems in another area. Letters are received periodically at the local Bureau of Land Management level that are highly critical of Bureau of land Management horse round-ups and the general treatment given wild horses. These letters highlight the sympathy and intense feeling one segment of the public has for wild horses..

Nationally, the issue of wild horses on western public rangelands has been an intense controversy spanning many years and beginning prior to the passage of the Wild Horse and Burro Act in 1971. Wild Horse preservationists are generally concerned with maintaining adequate habitat on public lands for optimum population levels of wild horses.

Ranchers who graze livestock on public lands view wild horses as competitive with livestock for forage and water and thus a threat to their interests. However, some ranchers and others support a maintenance of reasonable numbers of wild horses. Certain ranchers in this area have been reported to use wild horses for their private gain, and have trespass branded horses in the area; they will be opposed to any roundups.

Sportsmen and other wildlife interests also see horses as a competitive threat to wildlife populations and cite competition for food, water, cover, and space as being detrimental.

Nevada, the state with the highest wild horse population, was also the home state of the wild horse protection movement fostered by the late Velma Johnston ("Wild Horse Annie"). In Nevada, ranching is a mainstay business in rural counties. The levels of public interest in wild horses are high in Nevada, both from the protection and removal viewpoints. The Bureau of Land Management in Nevada has been and is involved in wild horse related court litigation. Litigations have been brought mainly by protectionist groups seeking to stop what they view as unwarranted horse gathering. However, the Nevada Department of Wildlife filed suit in 1979 in an attempt to expedite Bureau of Land Management horse gathering processes.

PARTICIPATING STAFF

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SUMMARY AND CONCLUSION

In many portions of the proposed gather area there is clear evidence of declining or deteriorated habitat condition. Excessive use by grazing animals, principally horses and livestock, is the primary causal factor. The subject area also provides key seasonal and yearlong habitat for many species of wildlife, notably mule deer.

Removal of 400 to 500 wild horses as proposed would be highly beneficial from the habitat management viewpoint. This would constitute removal of approximately 33 percent to 42 percent of the existing population, leaving sufficient numbers to maintain a viable herd.

The alternative proposing the removal of 800 horses would benefit this area tremendously because the trespass branded horse situation would be virtually eliminated, illegal horse gathering and branding operations could be virtually shut down, and habitat conditions could be expected to improve sooner. However, negative reactions from the various wild horse groups may be expected with the acceptance of this alternative.

Public interest is likely to be intense due to the controversial nature of the wild horse issue and the national visibility of the program. Viewpoints both pro and con should be anticipated.

Acceptance of the "no action" or the "removal of trespass branded horses" alternatives would result in a continuing acceleration of habitat damage. Under these alternatives there is a significant potential for eventual direct loss of wildlife and horses.

FINAL DRAFT

Reviewed by

	Initial	Date
Richard T. Watts, Manager Egan Resource Area	_____	_____
Kathy L. Kushler Environmental Coordinator	_____	_____

APPENDIX I

The proposed removal of 400 horses from the Buck, Bald and Maverick Area is just one of the management tools to be utilized to improve deteriorating range conditions. The following is a breakdown of current or proposed activities to be utilized for overall habitat improvement.

1. Trespass Abatement

Trespass by livestock and branded horses has been and continues to be a problem. Increased range use supervision has resulted in several trespasses, one of which has resulted in the permittee being scheduled to appear before an Administrative Law Judge.

While trespass is still an occasional problem, it has been reduced and is not as flagrant as it was in the past. It is anticipated that a high level of range use supervision will be maintained after the removal of the wild and branded horses.

Trespass branded horses are a major problem, despite numerous claimed and branded horses being removed during the claiming period allowed under the Wild Horse and Burro Act. It is estimated that 15-20 percent of the horses to be removed will bear the brands of several past and present permittees. The removal of these branded horses will eliminate a portion of the overall problems related to the current range deterioration.

2. Cooperation of Permittees

During the past several years, several permittees have improved and maintained eleven additional waters within the area. These waters have provided livestock, wildlife and wild horses with water which was otherwise unavailable or inadequate.

One permittee has acquired additional AUM's (Animal Unit Months) outside the district in hopes of relieving some of the grazing pressure currently being exerted upon his allotment. Another has taken some non-use and is planning to keep his cattle off of the white sage flats during the critical growing season. This action, however, without some reduction in horse numbers, will not accomplish the desired goal. Until such time as we are able to allocate the available forage, livestock reductions will continue to be on a voluntary basis.

3. Habitat Management Plans

A habitat management plan is currently being prepared to improve and protect crucial mule deer winter range which falls within this area. This crucial winter range is currently being impacted not only by wild horses, but by livestock grazing and intense mining and oil and gas exploration.

Projects associated with this HMP include, but are not limited to, prescribed burning, various vegetative manipulations, water development, protection of riparian habitat, acquisition of private property through exchange, livestock and wild horse reductions, along with grazing system revision and/or development.

4. Mining/Oil and Gas Exploration

The area is currently undergoing intense exploration for oil and gas; mining claims and prospects cover the area and Amselco is currently operating a small open pit mine and heap leaching process, with anticipated expansion in the future. Amselco has established a permanent camp, constructed an all-weather haul road and is preparing to apply for a power line right-of-way through Mt. Wheeler Power Company.

All of these activities have impacted and will continue to impact not only the wildlife, but the wild horses as well. Habitat has been and will be taken out of production, thus forcing all large herbivores to compete for a decreasing availability forage.

The loss of habitat isn't the only impact caused by these intensive activities. Such things as description of migration routes, disruption of major trail systems to water and actual physical harassment are occurring and are expected to increase as the search for precious metals, oil and gas intensifies.

Amselco has tentatively agreed to cooperate in the development of waters, protection of riparian habitat and revegetation of abandoned drill pads within the crucial mule deer winter range. These projects without some constraints or reductions, not only on wild horses but also livestock, will fail to achieve their goal. Constraints upon the mule deer rest with the State of Nevada through the establishment of hunting seasons and bag limits and cannot be addressed by the Bureau.

In addition, Amselco has recently announced bringing into production three adjacent open pits with full scale production expected to be achieved by 1981.

CLAIMED HORSES IN BUCK-BALD GATHER AREA

	Name	Number	Number removed at the end of the Claiming Period
*1.	Art Cook	237	145
2.	Frank Mader (Rose	200	Claim filled
3.	Paul Held	33	15
4.	Pete Cordano	150	134
5.	Kay Lear	235	Claim filled
6.	Julian Goicoechea	44	0
7.	Robert Healy (Paris)	100	Claim filled
8.	Joe Salvi	9	2
9.	Bertrand Paris & Sons	109	Claim filled

*Art Cook still maintains claim to approximately 300 head.