WILD HORSE ORGANIZED ASSISTAN INC. A Foundation for the Welfare of Wild Free-Roaming Horses and Burros

P. O. Box 555 Reno, Nevada 89504

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June 24, 1985

Mr. Rodney Harris Bureau of Land Management Box 831 Elko, Nevada 89801

Dear Mr. Harris:

Thank you very much for the opportunity to comment on the Environmental Assessment for the Cherry Creek, Goshute, Antelope Valley Wild Horse Gather.

Enclosed is WHOA's review of the ARCMP that supposedly was "coordinated" with this proposal. The context of each is highly disturbing.

The Schell MFP and the Wells RMP "are designed to provide a framework for future management of the public lands and resources consistent with legislation..."

Page 2, paragraph 3

The Antelope Range CMP far exceeded the proposed action under the land use planning and is illegal in its' present context; hereafter the ARCMP is not given any legitimacy.

Page 2, paragraph 4
What data does Elko District have that separates out horse use from cow use? Does the Elko District have utilization studies that show over the allowable use factor, and if so does the grazing system allow for the analization of the specific offender?

Page 2, paragraph 6
Does the BLM propose to follow the List/Watt instruction of using the current levels of livestock and monitoring? How can the BLM ignore previous range data as being inadequate to reduce livestock numbers, but use the same data to reduce wild horse numbers?



## Page three

In summary, I could go on, but WHOA is weary of playing the games BLM appears to enjoy. Instead I will enclose for you a copy of a letter received from Mr. Spang regarding the ARCMP that was supposedly so closely coordinated with your district. My concerns and the major flaws in that CMP have not been addressed, so regardless of the rest of the plan; WHOA cannot support the inclusion of that document, nor do we buy your assumptions for the remaining wild horse herd use area.

Most sincerely,

Dawn Y. Lappin (Mrs.)
Director

cc: David A. Hornbeck, Esq. Board of Trustees