



COMMISSION FOR THE
PRESERVATION OF WILD HORSES

255 W. Moana Lane
Suite 207A
Reno, Nevada 89509
(702) 688-2626

July 6, 1994

Kenneth G. Walker, District Manager
BLM-Ely District Office
HC 33 Box 33500
Ely, Nevada 89301-9408

Subject: Animal Damage Control Preliminary Environmental
Assessment

Dear Mr. Walker,

Thank you for the opportunity to review and comment on the preliminary EA for ADC for the Ely District. The Commission supports the fact that the Bureau is evaluating alternatives other than wantonly killing predators; therefore we are supporting B.3, Alternative #2.

Predators are important in the context of population controls, as demonstrated in the Montgomery Pass Wild Horse Herd out of Bishop, California. The natural predator influences not only population controls, but elimination of weaker animals, and herd movement.

PL92-195, the Wild Free Roaming Horse and Burro Act of 1971, specifically states "[they} will be considered as an integral part of the natural system;" the predators are part of that natural system.

Our concern has primarily centered on ADC and aerial gunning within HMA's, and specifically during the foaling season. Current BLM policy dictates that no "low-level" flights occur during the Districts foaling period. That any flights during this period are limited to emergencies or distribution flights, which in the latter case would be higher elevation flights. We have also experienced aerial gunning from a fixed wing during a capture operation.

The Commission recommends:

1) the previous operator must show significant efforts on their part; i.e., guard dogs, burros, lambing sheds, etc., before lethal controls are used.

Kenneth G. Walker, District Manager
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2) that a significant number of animals have been affected by predators, after the permittee has exhausted all non-lethal efforts, prior to the authorization of lethal controls.

3) that low level flights by "anyone" during the foaling period in an HMA, be prohibited.

4) notification to the State of Nevada Commission for the Preservation of Wild Horses on requests for ADC activity in an HMA.

5) be coordinated with the cyclical nature of rabbits and rodents. While the permittee may lose a few sheep to coyotes, he may lose more sheep for the loss of AUM's in a high rabbit population.

As a suggestion to the permittee, there has been much documentation on the fact that burros make excellent "guard" animals when cohabitating with sheep. With the forthcoming gathers proposed by BLM, the Forest Service, and the Lake Mead National Recreation Area there will be an extensive selection of burros available for adoption.

Again, we commend your District for suggesting and mandating that all non-lethal approaches be exhausted prior to lethal methods.

Sincerely,

CATHERINE BARCOMB
Executive Director

W H O A

WILD HORSE ORGANIZED ASSISTANCE
P.O. BOX 555
RENO, NEVADA 89504

7/6/94



... a note from

Dawn Y. Lappin

July 6, 1994

Kenneth G. Walker, District Manager
BLM-Ely District Office
HC 33 Box 33500
Ely, Nevada 89301-9408

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Sincerely,

DAWN Y. LAPPIN
Director



COMMISSION FOR THE
PRESERVATION OF WILD HORSES

Stewart Facility
Capitol Complex
Carson City, Nevada 89710
(702) 687-5589

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Reno, Nevada

May 29, 1991

Kenneth G. Walker, District Manager
BLM - Ely District Office
HC33 Box 150
Ely, Nevada 89301-9408

Dear Mr. Walker,

Thank you for the opportunity to comment on the preliminary Environmental Assessment which analyzes anticipated impacts of the 1991 Animal Damage Control (ADC) Annual Work Plan for the Ely District BLM.

Our first concern is for the scheduling of any flights in herd areas during foaling season for wild horses. The Bureau doesn't fly in herd areas during March through June. We would request that no flights be allowed in wild horse herd areas during foaling season.

We also see that there is a good possibility for wild horses and livestock getting caught in the traps. We would hope that every effort is made not to place the traps in "trafficking areas" known for those animals. We would like to know how many wild horses have been caught in ADC traps in the Ely area in the past?

Also, we would like to know if traps are arbitrarily set to capture animals for population control or if an offending animal is identified and then traps are set for that specific animal?

Lastly, we are very concerned to see that traps are only checked once a week. I can't imagine any animal being caught in a trap for that length of time, horribly suffering with no food or water, waiting for somebody to put it out of its misery. If the traps are being set for a specific animal, which it should be for offending animals only and not an arbitrary reduction to the population, then the traps should be checked much more often than once a week. We would recommend checking those traps daily.

Again, thank you for the opportunity to comment on the preliminary EA for the ADC Annual Work Plan. If you have any questions, please feel free to call.

Sincerely,

CATHY BARCOMB
Executive Director



United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Ely District Office
HC33 Box 150
Ely, Nevada 89301-9408



6830 (NV-043)
MAY 2 1991

Commission for Preservation of Wild Horses and Burros
c/o Executive Director
Stewart Facility
Capitol Complex
Carson City, NV 89710

Dear Sir:

Enclosed for your review and comment is the preliminary Environmental Assessment (EA) which analyzes anticipated impacts of the 1991 Animal Damage Control Annual Work Plan for the Ely District BLM. Your written comments must reach the Ely BLM office by June 3, 1991 to be considered for incorporation as part of the public comment on the preliminary environmental assessment.

If you have any questions on the EA or comment process please contact District Wildlife Biologist Mark Barber at (702) 289-4865 or FTS 469-2000.

Sincerely,

Acting Kenneth G. Walker,
District Manager

Enclosure
ADC Preliminary EA