

Ely

Buck + Bald

HTW-11AD11A1

2/18/83



ROBERT LIST
GOVERNOR

WILLIAM A. MOLINI
DIRECTOR

1100 VALLEY ROAD

P.O. BOX 10678

RENO, NEVADA 89520

TELEPHONE (702) 784-6214

February 18, 1983

Merrill DeSpain
Ely District Manager
Bureau of Land Management
Star Route 5, Box 1
Ely, NV 89301

Dear Merrill:

We recently received a copy of the Environmental Assessment (No. NV-040 3-8) for the Buck and Bald WildHorse Capture Plan. We appreciate the opportunity to review and provide comments and recommendations for your consideration. Since there is no possible way to adequately review and provide comment via the State Clearinghouse within the allotted time frame, we are responding directly to you. However, we will be sending the same response to the Clearinghouse and you will also receive our same response from them.

Our agency not only endorses the Buck/Bald capture plan, but encourages the land managing agencies to continue with programs aimed at the removal of excess horses that currently occupy the range. We certainly feel that the proposed action to gather a minimum of 600 horses would result in positive vegetative response. However, we would give stronger support for Alternative I which would allow gathering 800 head and reduce the population to 400 head. This proposal would result in even better vegetative response over a longer time period. In either case, wildlife will benefit by the removal of horses. We appreciate the fact that priority will be given to avoid winter gathering in heavy deer concentration areas when deer use is at its highest level. This stipulation would best be met by close coordination with the Area 10 biologist.

We fail to see where the discussion on mule deer reasonable numbers and herd reduction has any relevance to an EA for capture of horses. Any reduction of deer numbers should be based on a vegetative carrying capacity and documentation that deer are responsible for forage overutilization or range abuse. Your utilization figures show that preferred browse species are currently overutilized even before mule deer arrive on these winter ranges. We feel that mule deer reasonable numbers, herd reductions, and deer

AUMs should be discussed and resolved through Interagency input and not through an EA for capturing horses.

If you have any questions or comments, please do not hesitate to contact us.

Sincerely,



Larry Barngrover
Supervisor, Region II
1375 Mtn. City Hwy.
Elko, NV 89801
(702)738-5332

DE/lr

cc: Steve Foree
Habitat Section

W.H.O.A.!

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WILD HORSE ORGANIZED ASSISTANCE INC.

A Foundation for the Welfare of
Wild Free-Roaming Horses and Burros

P. O. Box 555
Reno, Nevada 89504
Telephone 323-5908
Area Code 702
851-4817

March 18, 1983

*My copy
gave one
to Molini*

Mr. W. Molini, Director
NEVADA DEPARTMENT OF WILDLIFE
1100 Valley Road
Reno, Nevada 89501

Dear Mr. Molini:

I believe we have a situation of mutual concern developing in the Ely District of the Bureau of Land Management. A recently proposed Environmental Assessment and Capture Plan developed by the Ely office, involves the removal of wild horses from Buck and Bald Mountain area. The document indicates the area is a critical winter range for a large number of mule deer, which are at present, arriving in the area only to find virtually no forage unutilized.

I can appreciate the magnitude of this problem for wildlife and horses. It is the BLM's proposed solution that causes grave concern on our part. To take off horses only to be replaced by livestock will do neither deer nor horses any good.

In response to my comments on these concerns, an irate Hal Bybee of the Ely BLM office replied that "the NDOW is pressuring the BLM to remove horses in this area." It is not my intention, nor ever has been, to maintain or increase one wildlife specie at the expense of another, and would readily accept a reduction of wild horse numbers, if such would really help the wildlife situation in this area.

However, it would seem appropriate to seek a reduction of both livestock and wild horses through an agreement from which no applicant would seek an increase in forage until it became available, to assure the needed forage is available for deer in this critical habitat.

In working with the State and Federal agencies, I have come to respect and believe, in most cases, the statement of wildlife management professionals, who in comparison with most range people, take a more objective approach in wildlife management; this objective approach often is reflected in the management of wild horse populations as well. It is in this light that I am concerned with Hal Bybee's statements and presentation of the Department's position.



I believe we both share mutual objectives for all wildlife which can best be attained through support and understanding of each others problems. I enclose a copy of our comments sent to the Ely BLM office on the Buck and Bald Environmental Assessment and Capture Plan for your review. I would very much appreciate your response and views on this particular situation and how we might correct the problem.

Most sincerely,

Dawn Y. Lappin

Dawn Y. Lappin (Mrs.)
Director