

ADC

✓  
4-8-92

April 8, 1992

Rodger Bryan  
BLM-Winnemucca District Office  
705 East 4th St.  
Winnemucca, Nevada 89445

Dear Rodger,

Thank you for the opportunity to be involved in the draft

ADC EA for the predator control activity in the Winnemucca

District.

One of our concerns would be for the scheduling of flights that would affect foaling season. We would suggest that unless absolutely necessary, no flights be allowed in herd areas during foaling season to avoid disruption of mares foaling or the additional stress of hearing the planes during that time. Will ADC be scheduling the flights or will you make that determination? The BLM does not fly in herd areas during those months to limit the disturbance to horses. Before any ADC flights are scheduled we would recommend that foaling be carefully observed if flights are in or near herd areas. Also, you need to consider the impact to horses of these continued flights over their area whether foaling season or not. Have you

analyzed the potential impacts to the herds?

We would like to comment on our concerns for those issues

surrounding ADC.

Is there a need for this program?

We feel that the cost of doing business on public lands,

such as the death loss to livestock, should be borne by the

permittee and not by the public. The public lands are where the

publics' wildlife species reside.

We feel that there are so many advances in the field of

fertility control that this should be a main objective in

controlling populations, not ADC! Many predator species are of

advantage to the entire ecosystem. This should be considered in

the overall scheme of populations.

Are there non-lethal methods of control or prevention?

Humane FERTILITY CONTROL such as immunocontraception and

other new methods that are being developed would help control the

populations. Better management by the permittees such as lambing

sheds and guard animals would be a preventative measure. The

present method of control by ADC encourages reproduction. The

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same numbers of animals are being killed yearly but no difference

in livestock deaths. This seems a very inefficient, cruel, and

costly method of control. If the general public knew of this destruction of their public interest, the program would collapse.

We are wondering how you are tracking all of the animals being destroyed. Will the permittees submit reports to the Winnemucca District Office on all of the predators they have destroyed and will that be considered in the total number of animals destroyed. How will you be keeping track of the animals eliminated and that you are not exterminating the entire population?

For our files, would you please supply us with the names of the operators that have filed complaints and the dates and locations of their complaints.

We would like to request a separate written response to our questions.

Again, thank you for the opportunity to express our concerns and suggest alternatives. If you have any questions or would like additional information on humane fertility control measures we would be more than happy to supply you with the information.

Please feel free to call.

Sincerely,

DAWN Y. LAPPIN  
Director

FAXED

BOB MILLER  
Governor

STATE OF NEVADA

CATHERINE BARCOMB  
Executive Director



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April 1, 1992

Mr. Roger Bryan  
BLM-Winnemucca District Office  
705 East 4th Street  
Winnemucca, Nevada 89445

Dear Mr. Bryan,

Thank you for the opportunity to provide comments on your EA of the ADC activities for the 1992 ADC Annual Work Plan for the Winnemucca District, BLM.

One of our concerns would have been for the scheduling of flights by ADC that would have affected foaling season. You have already addressed that issue. We would suggest that unless absolutely necessary, no flights be allowed in herd areas during foaling season to avoid disruption of mares foaling or the additional stress of hearing the planes during that time. Will ADC be scheduling the flights or will the Ely District make that determination? The BLM does not fly in herd areas during those months to limit the disturbance to horses. Before any ADC flights are scheduled we would recommend that foaling be carefully observed if flights are in or near herd areas. Also, in your EA, you have not considered the impact to horses of these continued flights over their area whether foaling season or not. Have you analyzed the potential impacts to the herds?

We would like to comment on our concerns for those issues surrounding ADC.

**#4 Is there a need for this program?**

We feel that the cost of doing business on public lands, such as the death loss to livestock, should be borne by the permittee and not by the public. The public lands are where the public's wildlife species reside.

We feel that there are so many advances in the field of fertility control that this should be a main objective in controlling populations, not ADC! Many predator species are of advantage to the entire ecosystem. This should be considered in the overall scheme of populations.

**#5 Are there non-lethal methods of control of prevention?**

Humane FERTILITY CONTROL such as immunocontraception and other new methods that are being developed would help control the populations. Better management by the permittees such as lambing sheds and guard animals would be a preventative measure. The present method of control by ADC encourages reproduction. The

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same numbers of animals are being killed yearly but no difference in livestock deaths. This seems a very inefficient, cruel, and costly method of control. If the general public knew of this destruction of their public interest, the program would collapse.


We are wondering how you are tracking all of the animals being destroyed. Will the permittees submit reports to the Winnemucca District Office on all of the predators they have destroyed and will that be considered in the total number of animals destroyed. How will you be keeping track of the animals eliminated and that you are not exterminating the entire population?

Lastly, on page 2, you mention 84 requests for assistance on BLM in the Winnemucca District. For our files, would you please supply us with the names of the 22 operators that have filed complaints and the dates and locations of their complaints.

We would like to request a separate written response to our questions.

Again, thank you for the opportunity to express our concerns and suggest alternatives. If you have any questions or would like additional information on humane fertility control measures we would be more than happy to supply you with the information. Please feel free to call.

Sincerely,



CATHERINE BARCOMB  
Executive Director