



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Winnemucca District Office
705 East 4th Street
Winnemucca, Nevada 89445

✓ 10-21-94
IN REPLY REFER TO:
4720.1
(NV-026.81)

October 21, 1994

Dear Interested Party:

Enclosed is a copy of the draft Winter 1995 Wild Horse Removal Plan and Environmental Assessment for the Blue Wing Mountains, Lava Beds, Seven Troughs, and Shawave/Nightingale Mountains Herd Management Areas (HMA's), and the Selenite Range Herd Area (HA). This constitutes notification that the Bureau of Land Management intends to gather horses no sooner than 28 days from the date of this letter.

The purpose of this gather is to reduce the wild horse population to appropriate management level (AML) in order to promote progression toward attainment of a "thriving natural ecological balance" within these HMA's. It is anticipated that the final removal plan will be issued Full Force and Effect to protect the environment from overuse and the wild horse population from a potential loss due to winter weather conditions. The removal plan will not be implemented until a Final Multiple Use Decision has been issued and is in effect for the Blue Wing/Seven Troughs Allotment.

The reader should note that there are discrepancies in the AML's between the Proposed Multiple Use Decision for the Blue Wing/Seven Troughs Allotment and this Capture Plan/Environmental Assessment. This is due to errors found in the carrying capacity calculations in the Re-evaluation which were identified in the protests for the Proposed Multiple Use Decision. The calculations were corrected and the resultant AML's are reflected in this Capture Plan/Environmental Assessment. The Final Multiple Use Decision will also reflect the corrected AML's.

The proposed action is in conformance with the Wild and Free Roaming Horse and Burro Act of 1971 (P.L. 92-195) section 1 and section 3(b)(1) and (2), as amended, and the Sonoma-Gerlach Land Use Plan dated July 9, 1982.

Please review this document and provide comments by November 21, 1994. If you have any questions regarding the removal, please contact Nadine Jackson or Tom Seley at (702) 623-1500.

Sincerely yours,

Bud C. Cribley, Area Manager
Sonoma-Gerlach Resource Area

Enclosure

U.S. DEPARTMENT OF THE INTERIOR

BUREAU OF LAND MANAGEMENT

Winnemucca District Office

Sonoma-Gerlach Resource Area

Winter 1995

Blue Wing/Seven Troughs

Wild Horse and Burro Removal Plan

I. INTRODUCTION

The intent of this removal plan is to outline the methods and procedures to be used in the capture of approximately 2,629 wild horses and burros, including removal of approximately 1246 wild horses and 245 burros from the Blue Wing Mountains, Lava Beds, Shawave/Nightingale Mountains, and Seven Troughs Herd Management Areas (HMA's) and approximately 183 wild horses and 59 burros from the Selenite Range Herd Area (HA). The removal will reduce the wild horse populations in Blue Wing Mountains, Seven Troughs HMA's and Selenite Range HA to near the Appropriate Management Level (AML), while the Lava Beds and the Shawave/Nightingale Mountains HMA's will remain substantially above AML. The Kamma Mountains HMA is not included in this capture plan because monitoring data, used to set AML's, is not available. The removal is proposed to begin on January 2, 1995 and to be completed by February 28, 1995.

II. GENERAL AREA DESCRIPTION - BACKGROUND DATA

A. Location

The capture areas are located in western Pershing County, southern Humboldt County, southeastern Washoe County, and northwestern Churchill County. Refer to the attached maps for the specific locations.

1. Blue Wing Mountains (NV-217) HMA

The Blue Wing Mountains HMA is located in the west-central portion of the Sonoma-Gerlach Resource Area. It is located in the Blue Wing Allotment, bordered on the west by a large dry lake, on the north by the Lava Beds HMA, on the east by the Seven Troughs HMA, and on the south by the Shawave Mountains HMA. The elevation ranges from 4,000 feet at the valley floor to 6592 feet.

The HMA is relatively small, comprised of approximately 17,713 acres, one hundred percent of which is public land.

Vegetative types range from juniper-sage types in the higher elevation, to sagebrush-grass types at moderate elevations, to shadscale-shrub and greasewood types in the valley bottoms.

2. Lava Beds HMA (NV-215)

The Lava Beds HMA is located in the west-central portion of the Sonoma-Gerlach Resource Area in both the Blue Wing Allotment and the Seven Troughs Allotment. The HMA is bordered on the west by the Selenite Range HA, on the north by the Western Pacific railroad tracks, on the east by the Kamma Mountains and Seven Troughs HMA's and on the south by the Blue Wing Mountains HMA. The elevation ranges from 4,500 feet to 6,979 feet.

The area is comprised of approximately 231,744 acres of public land. There are only 5 acres of private land in the Herd Management Area.

The vegetation in the HMA is characterized by big sagebrush, saltbush, bud sage, low sage, greasewood, rabbitbrush, horsebrush, Sandberg bluegrass, cheatgrass, squirreltail, needlegrass, buckwheat, filaree, halogeton, Russian thistle, tumbled mustard, and tansy mustard.

3. Nightingale Mountains HMA (NV-219)

The Nightingale Mountains HMA is located in the southwest portion of the Sonoma-Gerlach Resource Area in the Blue Wing Allotment. It is bordered on the west by Winnemucca Lake, on the north by the Selenite Range HA, shares a border on the east with the Shawave Mountains HMA, and is bordered on the south by the Truckee Range HA. The elevation ranges from 4,800 feet to 6,584 feet.

The area is comprised of approximately 76,019 acres; 3,559 acres (5%) private lands and 72,460 acres (95%) public lands.

Vegetative types range from low and big sage types in the higher elevations, to sagebrush-grass types at moderate elevations, to shadscale-shrub and greasewood types in the valley bottoms.

4. Seven Troughs HMA (NV-216)

The Seven Troughs HMA is located in the west-central part of the Sonoma-Gerlach Resource Area. The HMA is located within both the Blue Wing Allotment and the Seven Troughs Allotment. It is bordered on the west and north by the Lava Beds HMA, on the east by the Trinity Range HA, and on the south by Granite Springs Valley. The elevation ranges from 4,100 feet to 7,782 feet.

The area is comprised of approximately 147,910 acres; 17,635 (12%) private lands and 130,275 acres (88%) public lands.

Vegetative types range from juniper-sage type with mountain browse types in the higher elevations, to shadscale-shrub and greasewood (Sarcobatus spp.) types in the valley bottoms.

5. Shawave Mountains HMA (NV-218)

The Shawave Mountains HMA is located in the southwest portion of the Sonoma-Gerlach Resource Area. It is located in the Blue Wing Allotment, shares a border on the west with the Nightingale Mountains HMA, and is bordered on the north by the

Blue Wing Mountains HMA, on the east by Granite Spring Valley, and on the south by the Truckee Range HA. The elevation ranges from 4,000 feet to 7,471 feet.

The area is comprised of approximately 107,141 acres; 18,719 acres (17%) private lands and 88,422 acres (83%) public lands.

Vegetative types range from juniper-sage types in the higher elevations, to sagebrush-grass types at moderate elevations, to shadscale-shrub and greasewood types in the valley bottoms.

6. Selenite Range HA (NV-212)

The Selenite Range HA is located in the western portion of the Sonoma-Gerlach Resource Area in the northwestern area of the Blue Wing Allotment. It is bordered on the west by Highway 34, on the north by Highway 48, on the east by the Lava Beds HMA, and on the south by the Nightingale Mountains HMA. Elevations range from 4,000 feet to 8,237 feet at Kumiva Peak.

The area consists of approximately 130,089 acres; 3,563 acres (3%) private lands, and 126,526 acres (97%) public lands.

Vegetation types range from juniper-sage and mountain browse types in the higher elevations, to sagebrush-grass types at moderate elevations, to shadscale-shrub and greasewood types in the valley bottoms.

Two Wilderness Study Areas (WSA's) are located in the capture area; the Selenite Mountains WSA, NV-020-200, in the northern portion of the range and Mt. Limbo WSA, NV-020-201, in the southern portion of the range. Refer to the attached maps for the specific location of the WSA's.

The Selenite Range is a herd area and therefore not managed for wild horses or burros.

B. Justification

The Wild Free-Roaming Horse and Burro Act of 1971 (Public Law 92-195) as amended, Section 3(b)(1), states that the Secretaries of the Interior and Agriculture shall "determine appropriate management levels of wild free-roaming horses and burros on areas of public lands; and determine whether appropriate management levels should be achieved by the removal or destruction of excess animals, or other options (such as sterilization or natural controls on population levels)." Section 3(b)(2) states, "that (if) an overpopulation exists on a given area of the public lands and that action is necessary to remove excess animals, he shall immediately remove excess animals from the range so as to achieve appropriate management levels. Such action shall be taken until all excess animals have been removed so as to restore a thriving natural ecological balance

to the range, and protect the range from the deterioration associated with overpopulation."

The Blue Wing/Seven Troughs Allotment Re-evaluation and Multiple Use Decision set the AML's to maintain a thriving natural ecological balance for the HMA/HA's as indicated in the table below:

<u>HMA/HA</u>	<u>AML Horses/Burros</u>
Blue Wing Mtns	29/23
Lava Beds	119/13
Seven Troughs	124/37
Shawave/ Nightingales Mtns	112/0
<u>Selenite Range</u>	<u>0/0</u>
TOTAL	384/73

The removal plan will not be implemented until a Final Multiple Use Decision has been issued and is in effect for the Blue Wing/Seven Troughs Allotments.

C. Reference to Environmental Assessment (EA)

An environmental assessment was prepared analyzing the environmental impacts of adjusting the numbers and age structure of wild horses in the Blue Wing Mountains, Lava Beds, Seven Troughs, and Shawave/Nightingale Mountains HMA's. A Programmatic EA (No. NV-020-7-24) analyzing the environmental consequences and mitigating measures of different gathering methods was prepared and distributed for public comment in May 1987. After the incorporation of public comments, a Record of Decision and Finding of No Significant Impact was approved on August 4, 1987. This document is available for review at the Winnemucca District Office.

D. Population and Removal Data

The following table shows the AML and current population estimates in the HMA's and HA.

The population estimates are the results of a helicopter census conducted in August 1994.

<u>HMA/HA</u>	<u>AML Horses/Burros</u>	<u>Population Estimate Horses/Burros</u>
Blue Wing Mtns	29/23	56/57
Lava Beds	119/13	573/36
Seven Troughs	124/37	317/215
Shawave/ Nightingale Mtns	112/0*	1130/3
<u>Selenite Range</u>	<u>0/0</u>	<u>183/59</u>
TOTAL	384/73	2259/370

* There were no Burros found in the HMAs when the Wild Free-Roaming Horse and Burro Act of 1971 (P.L. 92-195) was passed.

Age structure information from past removals in these HMA's indicate that approximately 60% of the horse population is five years of age or younger, and 90% is nine and younger. If the age structure of the current population is similar, approximately 1,411 horses (60% of 2076 horses and 90% of 183 horses) will be removed from the HMA's. Based on current policy, wild horses removed from HMA's cannot exceed five years of age, while horses removed from outside HMA's, private land or emergency gather areas (i.e. drought) cannot exceed nine years of age. However, horses which do not meet these criteria may be removed if adopted within Nevada.

All captured animals, five and younger (9 and younger from the Selenite Range) will be shipped to the Palomino Valley Corrals. Wild Horses that are six years of age or older (10 and older from the Selenites) will be released back into their respective HMA's, or, as with Selenite wild horses, into an HMA at or near AML, if not selected for removal. Mares with foals will be released separately from the other release animals to ensure that the foals do not become separated from the mare.

Prior to release of older animals, each horse will be freeze branded on the left hip with the last two digits of the capture area HMA number to assist with the determination of movement between HMA's. Blood sampling may be conducted on approximately 10% of the captured animals to collect base line genetic information.

Because there is no age criteria to be met in removing burros, 297 burros will be removed, and AML for burros will be met.

IIIIII. METHODS FOR REMOVAL AND SAFETY

The methods employed during this capture operation will be herding animals with a helicopter to a trap built with portable panels, or herding animals with a helicopter to ropers. The Bureau of Land Management will contract with a private party for this operation. The following stipulations and procedures will be followed during the contract to ensure the welfare, safety and humane treatment of the wild horses in accordance with the provisions of 43 CFR Part 4700.

A. Trapping and Care of Animals

1. All capture attempts will be accomplished by the utilization of a helicopter. A minimum of one saddle horse shall be immediately available at the trap site to accomplish roping if necessary. Roping will be done only when necessary and only with prior approval by a BLM authorized officer. Under no circumstances shall animals be tied down for more than one hour.

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All captured animals, five and younger (9 and younger from the Selenite Range) will be shipped to the Palomino Valley Corrals. Wild Horses that are six years of age or older (10 and older from the Selenites) will be released back into their respective HMA's, or, as with Selenite wild horses, into an HMA at or near AML, if not selected for removal. Mares with foals will be released separately from the other release animals to ensure that the foals do not become separated from the mare.

Prior to release of older animals, each horse will be freeze branded on the left hip with the last two digits of the capture area HMA number to assist with the determination of movement between HMA's. Blood sampling may be conducted on approximately 10% of the captured animals to collect base line genetic information.

Because there is no age criteria to be met in removing burros, 311 burros will be removed, and AML for burros will be met.

I.I.I.I.I. METHODS FOR REMOVAL AND SAFETY

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2. The helicopter shall be used in such a manner that bands will remain together. Foals shall not be left behind. The project helicopter actions may occasionally be observed by a Government controlled helicopter. All actions of the Government helicopter will be coordinated with the Contractor to prevent interference with the project helicopter and contract operations.

In the event an additional helicopter is not available to observe the project helicopter, other methods will be utilized to observe the removal operations such as using observers on horseback, in vehicles and/or placing stationary observers in strategic locations.

3. The rate of movement and distance that animals travel shall not exceed limitations set by a BLM employee who will consider terrain, physical barriers, weather, condition of the animals and other factors.

The terrain in the removal areas varies from flat valley bottoms to mountainous, and the animals may be located at all elevations (ranging from 4,000 feet to 8,237 feet) depending upon weather conditions and precipitation.

Experience gained from past removals in these areas indicates the proposed action may cause undue stress to the animals. It will be difficult to remove animals from these areas without some concern for their welfare due to the following reasons:

- a. The parent material in the capture areas ranges from granitic to basalt parent material. The volcanic material is very sharp, and as a result, there is concern that some animals' hoofs and fetlocks may become injured, especially the younger animals.
- b. There are steep and extensive escarpments in the capture areas which limit the areas where animals can be brought into the trap or ropers.

Prior to any gathering operation, BLM will provide for a pre-capture evaluation of existing conditions in the gather areas. The evaluation will include animal condition, prevailing temperatures, drought conditions, soil conditions, topography, road conditions, location of fences and other physical barriers, and animal distribution in relation to potential trap locations. The evaluation will also arrive at a conclusion as to whether the level of activity is likely to cause undue stress to the animals, and whether such stress would be acceptable to the animals if veterinarian expertise were present, or whether a delay in the capture activity is

vet consulted?

warranted. If it is determined that the capture efforts necessitate the services of a veterinarian, one will be obtained before the capture will proceed.

The Contractor will be provided with a topographic map of the removal area which shows acceptable trap locations and existing fences and/or physical barriers prior to any gathering operations.

The Contractor will also be appraised of the above conditions and will be given direction regarding the capture and handling of animals to ensure their health and welfare is protected.

4. It is estimated that a minimum of two trap sites will be required in each capture area to accomplish the work. All trap locations and holding facilities must be approved by a BLM employee prior to construction. The Contractor may also be required to change or move trap locations as determined by the BLM. All traps and holding facilities not located on public land must have prior written approval of the landowner.

Each general site will be selected by a BLM employee after determining the habits of the animals and observing the topography of the area. Site specific locations may be selected by the Contractor with the BLM's approval within this general preselected area. Trap sites will be located to cause as little injury and stress to the animals and as little damage to the natural resources of the area as possible. Sites will be located on or near existing roads and will receive cultural, and threatened/endangered plant and animal clearances prior to construction. Additional trap sites may be required, as determined by the BLM, to relieve stress caused by certain conditions at the time of the gather (i.e. dust, rocky terrain, temperatures, deep snow, etc.). Trap sites located within WSA's shall be constructed on roads or ways and shall not extend farther than 50 feet from the edge of the road or way.

Due to the many variables affecting the distribution of animals such as weather, health and condition, and time of year, it is not possible to identify specific locations at this time. They will be determined at the time of the removal operation.

5. All traps, wings, and holding facilities shall be constructed, maintained and operated to handle the animals in a safe and humane manner and be in accordance with the following:
 - a. Traps and holding facilities shall be constructed of portable panels, the top of which shall not be less than 72 inches high for horses and 60 inches for burros, and

the bottom rail of which shall not be more than 12 inches from the ground level. All traps and holding facilities shall be oval or round in design.

- b. All loading chute sides shall be fully covered with plywood, or like material, without holes or separation of plies. The loading chute shall also be a minimum of 6 feet high.
 - c. All runways shall be a minimum of 30 feet long and a minimum of 6 feet high for horses, and 5 feet for burros, and shall be covered with plywood, or like material, without holes or separation of plies a minimum of 1 foot to 5 feet above ground for burros and 1 foot to 6 feet for horses. The location of a government furnished portable fly chute to restrain, age, or provide additional care for the animals shall be placed in the runway in a manner as instructed by or in concurrence with a BLM employee.
 - d. Wings shall not be constructed out of barbed wire or other material injurious to animals and must be approved by a BLM employee. Wings may be constructed along existing fence lines, at the discretion of a BLM employee, only if the barbed wire or other wire fencing material is removed from the fence posts and laid on the ground for the length of the wing, or if portable panels are placed along the inside of the fence to protect the animals from injury from fence wire.
 - e. All crowding pens, including the gates leading to the runways, shall be covered with a material which prevents the animals from seeing out (plywood without holes or separation of plies, burlap, jute, etc.) and shall be covered a minimum of 1 foot to 5 feet above ground level for burros and 2 feet to 6 feet for horses. Eight linear feet of this material shall be capable of being removed or let down to provide a viewing window.
 - f. All pens and runways used for the movement and handling of animals shall be connected with hinged self-locking gates.
6. No fence modifications will be made without authorization from the BLM. The Contractor shall be responsible for restoration of any fence modifications which he has made.

If the route the Contractor proposes to herd animals, passes through a fence, the Contractor shall be required to roll up the fence material and pull up the posts to provide at least a 50 yard gap. The standing fence on each side of the gap

will be well flagged or covered with jute or like material for a distance of 50 yards from the gap on each side.

7. When dust conditions occur within or adjacent to the trap or holding facility, the Contractor shall be required to wet down the ground with water to ensure that dust does not pose a problem to personnel or to the animals.
8. Alternate pens within the holding facility shall be furnished by the Contractor to separate animals with small foals, sick and injured animals, and stray animals from the other animals. Animals shall be sorted as to age, number, size, temperament, sex, and condition when in the holding facility so as to minimize, to the extent possible, injury due to fighting and trampling.
9. Animals shall be transported to final destination from temporary holding facilities within 24 hours after capture unless prior approval is granted by the BLM for unusual circumstances. Animals shall not be held in traps and/or temporary holding facilities on days when there is no work being conducted, except as specified by the BLM. The Contractor shall schedule to arrive at the final destination between 7:00 a.m. and 4:00 p.m. No shipments shall be scheduled to arrive at final destination on Sundays or Federal holidays unless prior approval has been obtained by the BLM. Animals shall not be allowed to remain standing in trucks while not in transport for a combined period of greater than 3 hours.
10. The Contractor shall provide animals held in the traps and/or holding facilities with a continuous supply of fresh clean water at a minimum rate of 10 gallons per animal per day. Animals held for 10 hours or more in the traps or holding facilities shall be provided good quality hay at the rate of not less than two pounds of hay per 100 pounds of estimated body weight per day.

Separate water troughs shall be provided at each pen where animals are being held. Water troughs shall be constructed of such material (e.g. rubber, rubber over metal) so as to avoid injury to animals.
11. It is the responsibility of the contractor to provide security to prevent loss, injury or death of captured animals until delivery to final destination.
12. The Contractor shall restrain sick or injured animals if treatment by the Government is necessary. The BLM will determine if injured animals must be destroyed and provide for destruction of such animals. The Contractor may be required to dispose of the carcasses as directed by the BLM.

Any severely injured or seriously sick animal shall be destroyed in accordance with 43 CFR Subpart 4730.1. Animals shall be destroyed only when a definite act of mercy is needed to alleviate pain and suffering. A BLM employee will have the primary responsibility for determining when an animal will be destroyed and will perform the actual destruction. When a BLM employee is unsure as to the severity of an injury or sickness, a veterinarian will be called to make a diagnosis and final determination. Destruction shall be done in the most humane method available. A veterinarian can be called, if necessary, to care for any injured animal.

The carcasses of the animals that die or must be destroyed as a result of any infectious, contagious, or parasitic disease will be disposed of by burial to a depth of at least 3 feet.

The carcasses of the animals that must be destroyed as a result of age, injury, lameness, or noncontagious disease or illness will be disposed of by removing them from the capture site or holding corral and placing them in an inconspicuous location to minimize the visual impacts. Carcasses will not be placed in drainages regardless of drainage size or downstream destination.

13. Branded or privately owned animals whose owners are known will be impounded by BLM, and if not redeemed by payment of trespass and capture fees, will be sold at public auction. If owners are not known, the private animals will be turned over to the State for processing under Nevada estray laws.

B. Special Handling of Animals

The Contractor will be required to assist in the special handling of some animals before their release or transport. Such special handling includes, but is not limited to, inoculations, sterilization, freeze branding.

C. Motorized Equipment

1. All motorized equipment employed in the transportation of captured animals shall be in compliance with appropriate State and Federal laws and regulations applicable to the humane transportation of animals.
2. Vehicles shall be in good repair, of adequate rated capacity, and operated so as to ensure that captured animals are transported without undue risk or injury.
3. Only stock trailers with a covered top shall be allowed for transporting animals from traps to temporary holding facilities. Only bobtail trucks, stock trailers, or single

deck trucks shall be used to haul animals from temporary holding facilities to final destination. Sides or stock racks of transporting vehicles shall be a minimum height of 6 feet 6 inches from vehicle floor. Single deck trucks with trailers 40 feet or longer shall have two partition gates providing three compartments within the trailer to separate animals. Trailers less than 40 feet shall have at least one partition gate providing two compartments within the trailer to separate animals. The compartments shall be of equal size plus or minus 10 percent. Each partition shall be a minimum of 6 feet high and shall have a minimum 5 foot wide swinging gate. The use of double deck trailers is unacceptable and will not be allowed.

4. All vehicles used to transport animals to the final destination shall be equipped with at least one door at the rear end of the vehicle, which is capable of sliding either horizontally or vertically. The rear door must be capable of opening the full width of the trailer. All panels facing the inside of all trailers must be free of sharp edges or holes that could cause injury to the animals. The material facing the inside of the trailer must be strong enough, so that the animals cannot push their hooves through the sides.

The Contractor will not be allowed to begin work on the contract until all vehicles and equipment are in compliance with these stipulations.

5. Floors of vehicles and the loading chute shall be covered and maintained with wood shavings to prevent the animals from slipping. The adequacy of this material will be confirmed prior to every load by a BLM employee.
6. Loading and transport of animals in any vehicle shall be as directed by a BLM employee and may include limitations on numbers according to age, size, temperament and animal condition. The following minimum linear feet per animal shall be allowed per standard 8 foot wide stock trailer/truck:

1.40 linear foot per adult horse (11 square feet per adult horse)

1.00 linear foot per adult burro (8 square feet per adult burro)

.75 linear foot per horse foal (6 square feet per horse foal)

.50 linear foot per burro foal (4 square feet per burro foal)

The BLM employee supervising the loading of animals to be transported from the trap site to the temporary holding corral will require separation of small foals and/or weak animals

from the rest should it appear that the animals may be injured during the trip. The distance and condition of the road will be considered in making this determination. Animals shipped from the temporary holding corral to the BLM facility will be separated by sex and age class (including small yearlings). Further separation may be required should condition of the animals warrant it.

The BLM employee supervising the loading may require the contractor to off load horses should it appear that there are too many animals on the vehicle.

7. The BLM shall consider the condition of the animals, weather conditions, type of vehicles, distance to be transported, or other factors when planning for the movement of captured animals. The BLM shall provide for any brand and/or inspection services required for the captured animals.

It is currently planned to ship all animals to the Palomino Valley facility. Communication lines have been established with Palomino Valley personnel involved in off-loading the animals to receive feedback on how the animals arrive. Should problems arise, gathering methods, shipping methods and/or separation of the animals will be changed in an attempt to alleviate the problems.

8. If a BLM employee determines that dust conditions are such that animals could be endangered during transportation, the Contractor will be instructed to adjust speed. The maximum distance over which animals may have to be transported on dirt roads is approximately 80 miles per load.

In general, roads in the capture areas are in fair to good condition. If a problem develops, speed restrictions shall be set or alternate routes used.

Periodic checks by BLM employees will be made as the animals are transported along dirt roads. If speed restrictions are in effect, then BLM employees will, at times, follow and/or time trips to ensure compliance.

C. Helicopter, Pilot and Communications

1. The Contractor must operate in compliance with Federal Aviation Regulations, Part 91. Pilots provided by the Contractor shall comply with the Contractor's Federal Aviation Certificates, applicable regulations of the State of Nevada, and shall follow what are recognized as safe flying practices.
2. When refueling, the helicopter shall remain a distance of at least 1,000 feet or more from animals, vehicles (other than the fuel truck), and personnel not involved in refueling.

3. The BLM shall have the means to communicate with the Contractor's pilot and be able to direct the use of the gather helicopter at all times. If communications cannot be established, the Government will take steps as necessary to protect the welfare of the animals.
4. The proper operation, service and maintenance of all contractor furnished helicopters is the responsibility of the Contractor. The BLM reserves the right to remove from service, pilots and helicopters which, in the opinion of the BLM violate contract rules, are unsafe, or otherwise unsatisfactory. In this event, the Contractor will be notified in writing to furnish replacement pilots or helicopters within 48 hours of notification. All such replacements must be approved in advance of operation by the BLM.
5. The contractor shall provide the COR/PI with the total flight hours flown at the completion of the delivery order. The COR must submit a completed SERVICE CONTRACT FLIGHT HOURS REPORT to the local aviation manager and to the Contracting Officer.

IV. RESPONSIBILITY AND LINES OF COMMUNICATION

The Contracting Officers Representative, Tom Seley, and Project Inspectors (Ron Hall and Nadine Jackson) from the Winnemucca District have the direct responsibility to ensure the Contractor's compliance with the contract stipulations. However, the Sonoma-Gerlach Area Manager and the Winnemucca District Manager will take an active role to ensure the appropriate lines of communication are established between the field, District, State, and Palomino Valley Corral offices. All employees involved in the gathering operations will keep the best interests of the animals at the forefront at all times.

All publicity, formal public contact and inquiries will be handled through the Sonoma-Gerlach Area Manager. This individual will be the primary contact and will coordinate the contract with the Palomino Valley Corrals to ensure animals are being transported from the capture site in a safe and humane manner and are arriving in good condition.

The contract specifications require humane treatment and care of the animals during removal operations. These specifications are designed to minimize the risk of injury and death during and after capture of the animals. The specifications will be enforced vigorously.

Should the Contractor show negligence and/or not perform according to contract stipulations, he will be issued written instructions, stop work orders, or defaulted.

Preliminary
Environmental Assessment
Winter 1994
Wild Horse Removal

I. Description of Alternatives

A. Background Information

This document has been prepared to assess the environmental impacts of adjusting the numbers and age structure of wild horses in the Blue Wing Mountain, Lava Beds, Seven Troughs, and Shawave/Nightingale Mountains Herd Management Areas (HMA's). This EA does not assess the impacts of different methods of gathering horses. These impacts were analyzed and mitigating measures stipulated in a programmatic EA (No. NV-020-7-24) prepared in May 1987. After the incorporation of public comments, a Record of Decision and Finding of No Significant Impact was approved on August 4, 1987 and the assessment remains valid today. That EA is on file and available for review in the Winnemucca District Office.

B. Purpose and Need

The Wild Free-Roaming Horse and Burro Act of 1971 (Public Law 92-195) Section 3(b)(1), as amended, states, " the Secretaries of Interior and Agriculture shall determine appropriate management levels (AML) of wild free-roaming horses and burros on areas of public lands; and determine whether appropriate management levels should be achieved by the removal or destruction of excess animals, or other options (such as sterilization or natural controls on population levels)." Section 3(b)(2) as amended states," that if an overpopulation exists on a given area of the public lands and that action is necessary to remove excess animals, he shall immediately remove excess animals from the range so as to achieve appropriate management levels. Such action shall be taken until all excess animals have been removed from the range so as to restore a thriving natural ecological balance to the range, and protect the range from the deterioration associated with over population."

The purpose of the proposed action is to remove all wild horses five years and younger from the Blue Wing Mountain, Lava Beds, Seven Troughs, Shawave/Nightingale Mountains HMA's, to remove all wild horses, exclusive of age, from the Selenite Range Herd Area (the Coordinated Resource Management Plan agreement of July 24, 1984, established the Selenite Range as a Herd Area (HA) with an AML of 0), and to remove all burros, exclusive of age down to appropriate management levels (AML's) in all capture areas in conformance with the Strategic Plan For Management Of Wild Horses And Burros On Public Lands (June 1992). The Strategic Plan and Washington Office Instruction Memorandum 93-30, dated October 23, 1992, only horses 5 years of age and younger would be removed from Herd Management Areas. All horses would be removed from public lands outside the

HMA's (this includes HA's not managed for wild horses), but only horses 9 years of age and younger would be shipped for adoption. Older horses from these areas must be returned to an HMA. Deviation from this policy is permitted only upon written approval from the Wild Horse and Burro National Program Office. The Blue Wing/Seven Troughs Allotment re-evaluation and multiple use decision established the AML's for the proposed capture areas.

C. Proposed Action

The proposed action is to remove all animals (5 years and younger) in excess of AML from the Blue Wing Mountain and Seven Troughs HMA's. Due to the Bureau's selective removal policy, all animals five years of age and younger would be removed from the Lava Beds and Shawave/Nightingale Mountains HMA's, however the areas would remain above AML. Horses 5 years of age and under along with burros removed from the capture areas would be shipped to the National Wild Horse and Burro Center at Palomino Valley for adoption. All animals would be removed from the Selenite Range HA; horses 10 and over would be released into HMA's with populations near AML. There is no Bureau selective removal policy for burros; they would be removed down to established AML's in all HMA's where they occurred on December 15, 1971.

The Blue Wing/Seven Troughs Allotment Re-evaluation and Final Full Force and Effect Multiple Use Decision dated October, 1994, established the appropriate management levels for the HMA's as noted below in order to maintain a thriving natural ecological balance.

The following table shows the AML's and current population estimates of wild horses and burros in the capture areas. The population estimates are the results of a helicopter census conducted in August 1994.

<u>HMA/HA</u>	<u>AML</u>	<u>Population</u>
	<u>Horses/Burros</u>	<u>Estimate</u>
Blue Wing Mtns	29/23	56/57
Lava Beds	119/13	573/36
Seven Troughs	124/37	317/215
Shawave-		
Nightingales Mtns	112/0*	1130/3
<u>Selenite Range</u>	<u>0/0</u>	<u>183/59</u>
TOTAL	384/73	2259/370

* There were no Burros found in the HMA when the Wild Free-Roaming Horse and Burro Act of 1971 (P.L. 92-195) was passed.

Age structure information from past removals in these HMA's indicate that approximately 60% of the population is 5 years of age or younger and 90 % is nine years of age or younger. If the age structure of

the current population is similar, approximately 1,411 horses (60% of 2076 horses and 90% of 183 horses) would be removed from the HMA's. There is no Bureau selective removal policy for burros. Three-hundred-four burros would be removed, bringing the HMA's to AML for burros.

Prior to release of older animals, each horse would be freeze branded on the left hip with the last two digits of the capture area HMA number to assist with the determination of movement between HMA's. Blood sampling may be conducted on approximately 10% of the captured animals to collect base line genetic information.

The proposed removal operation is projected to begin January 2, 1995, and to be completed by February 28, 1995.

D. Alternatives to the Proposed Action

NO ACTION - Wild horses would not be gathered from the Blue Wing Mountains, Lava Beds, Seven Troughs, Shawave Mountains and Nightingale Mountains HMA's and the Selenite Range HA which would result in continued degradation of the upland and riparian habitat. The overall health and condition of the herds could be adversely affected by a continued overpopulation of wild horses within these HMA's.

II. Affected Environment

A. Blue Wing Mountains (NV-217) HMA

The Blue Wing Mountains HMA is located in the west-central portion of the Sonoma-Gerlach Resource Area. It is located in the Blue Wing Allotment, bordered on the west by a large dry lake, on the north by the Lava Beds HMA, on the east by the Seven Troughs HMA, and on the south by the Shawave Mountains HMA. The elevation ranges from 4,000 feet at the valley floor to 6592 feet.

The HMA is relatively small, comprised of approximately 17,713 acres, one hundred percent of which is public land.

Vegetative types range from juniper-sage types in the higher elevation, to sagebrush-grass types at moderate elevations, to shadscale-shrub and greasewood types in the valley bottoms.

B. Lava Beds HMA (NV-215)

The Lava Beds HMA is located in the west-central portion of the Sonoma-Gerlach Resource Area in both the Blue Wing Allotment and the Seven Troughs Allotment. The HMA is bordered on the west by the Selenite Range HA, on the north by the Western Pacific railroad tracks, on the east by the Kamma Mountains and Seven Troughs HMA's and on the south by the Blue Wing Mountains HMA. The elevation ranges from 4,500 feet to 6,979 feet.

The area is comprised of approximately 231,744 acres of public land. There are only 5 acres of private land in the Herd Management Area.

The vegetation in the HMA is characterized by big sagebrush, saltbush, bud sage, low sage, greasewood, rabbitbrush, horsebrush, Sandberg bluegrass, cheatgrass, squirreltail, needlegrass, buckwheat, filaree, halogeton, Russian thistle, tumbled mustard, and tansy mustard.

C. Nightingale Mountains HMA (NV-219)

The Nightingale Mountains HMA is located in the southwest portion of the Sonoma-Gerlach Resource Area in the Blue Wing Allotment. It is bordered on the west by Winnemucca Lake, on the north by the Selenite Range HA, on the east by the Shawave Mountains HMA, and on the south by the Truckee Range HMA. The elevation ranges from 4,800 feet to 6,584 feet.

The area is comprised of approximately 76,019 acres; 3,559 acres (5%) private lands and 72,460 acres (95%) public lands.

Vegetative types range from low and big sage types in the higher elevations, to sagebrush-grass types at moderate elevations, to shadscale-shrub and greasewood types in the valley bottoms.

D. Seven Troughs HMA (NV-216)

The Seven Troughs HMA is located in the west-central part of the Sonoma-Gerlach Resource Area. The HMA is located within both the Blue Wing Allotment and the Seven Troughs Allotment. It is bordered on the west and north by the Lava Beds HMA, on the east by the Trinity Range HA, and on the south by Granite Springs Valley. The elevation ranges from 4,100 feet to 7,782 feet.

The area is comprised of approximately 147,910 acres; 17,635 (12%) private lands and 130,275 acres (88%) public lands.

Vegetative types range from juniper-sage type with mountain browse types in the higher elevations, to shadscale-shrub and greasewood (Sarcobatus spp.) types in the valley bottoms.

E. Shawave Mountains HMA (NV-218)

The Shawave Mountains HMA is located in the southwest portion of the Sonoma-Gerlach Resource Area. It is located in the Blue Wing Allotment, bordered on the west by the Nightingale Mountains HMA, on the north by the Blue Wing Mountains HMA, on the east by Granite Spring Valley, and on the south by the Truckee Range HA. The elevation ranges from 4,000 feet to 7,471 feet.

The area is comprised of approximately 107,141 acres; 18,719 acres

(17%) private lands and 88,422 acres (83%) public lands.

Vegetative types range from juniper-sage types in the higher elevations, to sagebrush-grass types at moderate elevations, to shadscale-shrub and greasewood types in the valley bottoms.

F. Selenite Range HA (NV-212)

The Selenite Range HA is located in the western portion of the Sonoma-Gerlach Resource Area in the northwestern area of the Blue Wing Allotment. It is bordered on the west by Highway 34, on the north by Highway 48, on the east by the Lava Beds HMA, and on the south by the Nightingale Mountains HMA. Elevations range from 4,000 feet to 8,237 feet at Kumiva Peak.

The area consists of approximately 130,089 acres; 3,563 acres (3%) private lands, and 126,526 acres (97%) public lands.

Vegetation types range from juniper-sage and mountain browse types in the higher elevations, to sagebrush-grass types at moderate elevations, to shadscale-shrub and greasewood types in the valley bottoms.

There are two WSA's contained within the Selenite Range HA capture area; Selenite Mountains WSA, NV-020-200 in the northern portion of the range and Mt. Limbo WSA, NV-020-201 in the southern portion (see the attached maps).

G. Critical Elements

The following critical elements are not affected: Air Quality, ACEC, Farmlands, Floodplains, Native American Religious Concerns, Solid or Hazardous Wastes, Wild and Scenic Rivers, and Paleontological Resources. A check of the Nevada Threatened and Endangered Plant Map Book (Nevada State Museum, 1988) located in the Winnemucca District Office, shows that no sensitive plants are known to occur in the immediate vicinity of the proposed actions. No threatened or endangered wildlife species would be impacted either.

III. Environmental Consequences

A. Impacts of Proposed Action

1. Vegetation, soil, and water

Implementation of the proposed action would reduce the wild horse and burro populations to near AML in the Blue Wing Mountains and Seven Troughs HMA's, and the Selenite Range HA, thereby helping to promote a thriving natural ecological balance. Reduction to AML and implementation of livestock management numbers and actions would result in an increase in vegetation density, vigor, reproduction, productivity, and

forage availability due to reduced competition.

The Lava Beds and Shawave/Nightingale Mountains HMA's would remain substantially above AML. Though there would be an increase in vegetation density, vigor, reproduction, productivity, and forage availability, it would be less than would occur in the other HMA's and HA.

The proposed action would lessen the impact of hoof action on the soil around unimproved springs and stream bank riparian areas which should lead to an improvement in stream bank stability, reduced sedimentation, and improved riparian habitat conditions. There would also be a reduction in hoof action on upland habitat area and reduced competition for available water sources.

2. Wildlife and Livestock

The proposed action would result in reduced competition which would increase the quantity and quality of forage available to livestock and wildlife. There would be less disturbance associated with wild horses along stream bank riparian habitat and adjacent upland habitat.

3. Wild Horses

Social structure may be affected since the selective removal process would result in turning back more studs than mares, increasing the number of bachelor bands within the HMA's and/or decreasing the average band size. By increasing the number of studs, competition for mares may increase, which could result in increased injuries to horses as studs compete for breeding partners. Data collected within the proposed capture areas from "gate cut" gathers (where all captured animals are removed from the range) from 1981 through 1987 show whole populations were made up of 46% studs and 54% mares, while the percentages for horse populations age 6 and over were 47% studs and 53% mares (Appendix A). However, this data was collected from "gate cut" gathers, where only the first horses into the trap are taken and does not provide an accurate overall sex ratio. Data collected from "total" gathers followed by selective removal, where all horses are gathered off the range before releasing over-age horses back onto the range, indicate the sex ratio of animals six and over ranges from 52% males and 48% females to 62% males and 38% females. The sex ratio of older horses seems to become more closely aligned, 52% studs to 48% mares, after the second "total" selective removal gather (Appendix B).

Selective removal may lead to a large decrease in foaling and recruitment rate the first year following removal as bands reorganize, especially if the winter is severe, or it may lead

to an immediate increase. Prior to the winter 1993 selective removal, the reproductive rate in the Buffalo Hills, the Granite Range and the Fox and Lake HMA's averaged 23% according to an October 1992 census. Following the winter 1993 removal, a July 1993 census showed a decreased reproductive rate: Granite Range, 13.4%; Buffalo Hills, 4.3%; Fox and Lake Range, 4.2% (Spring rate). Due to the severity of the 1993 winter, mares probably sloughed foals or reabsorbed fetuses, contributing to the low reproductive rate of the following foaling season. The following year (1994) the reproductive rate in the same HMA's increased to an average of 16.1%. The Black Rock Range, Calico Range and Warm Springs Canyon HMA's however, showed a dramatic increase in reproduction immediately following the selective removal of winter 1994. The Black Rock Range, previously averaging a 20.1% reproductive rate, experienced a summer 1994 rate of 26.6%; The Calico Range averaged 21.1% prior to the gather, but showed a 31.3% reproductive rate in 1994; Warm Springs Canyon rose from a 22.8% average rate to a 31.1% rate in August 1994 (Appendix C).

The average reproductive rate between fall 1974 and summer 1992 in the Blue Wing/Seven Troughs HMA's proposed for gather in November, as collected from both summer and fall census data, was 23.2% (Appendix D). This year's average reproductive rate was ascertained as 22.9%. Considering the severity of this year's continuing drought and the affect it may have had on the health of pregnant mares, along with the stress of the proposed gather and the reorganization of bands after the gather, next year's reproductive rate could be expected to decrease. The second year following removal may find the reproductive and recruitment rate recovering due to stabilization of herd social structure, improved body condition of both pregnant and lactating mares as a result of reduced competition for forage and water, and the removal of younger, less productive mares from the range (peak foaling years are from ages 4 through 9). Older mares due to improved nutrition may cycle and produce foals. However, as mares age past their peak foaling years, the reproductive rate may decrease. Survival rate of foals may also increase due to less competition for forage and water.

Implementation of the proposed action would shift the age structure within the HMA's from a normal age distribution to a population comprised primarily of horses six years of age and older. The number of wild horses in each HMA may stabilize as older age animals are lost from the population through natural processes. By releasing horses six years of age and older, the base genetic makeup of the herds should remain intact within the HMA's. The outcome of this action is not fully known. As with other selective gathers, the populations would be monitored to determine the outcome of selective

removal in these areas.

4. Wilderness

Wilderness values would be positively affected by implementation of the proposed action. It would result in an improved ecological condition, with associated watersheds, soil and plant communities benefitting. The result would be a more aesthetically appealing element for the public to enjoy than is the existing situation.

5. Cultural

To prevent impact to cultural resources, each capture site would receive cultural clearance prior to trap construction.

B. Alternative-No Action

Wild horse populations would continue to increase, and the forage resource would continue to be degraded. Preferred forage species would continue to be over utilized resulting in decreases in vegetation densities, vigor, reproduction, productivity, and forage availability. If normal to above normal winter precipitation is received, there is a strong potential for a significant loss of wild horses from these areas. Below normal precipitation may result in decreased forage production which could lead to decreased body conditions (from good to fair to poor) of horses within the HMA's. Pregnant mares and mares with foals would be affected more than studs or mares without foals.

The number of livestock authorized to graze the Blue Wing/Seven Troughs Allotment would be adjusted downward more severely than is now necessary or removed early from the pasture in order to attain a thriving natural ecological balance. This would result in the permittee not being able to fully utilize his authorized grazing use.

C. Mitigating Measures

All phases of the gather and processing operation would be carried out according to Bureau policy with the intent of conducting as safe and humane an operation as possible.

Mares with foals would be released separately from other release animals to ensure that foals do not become separated from the mares.

To the extent possible, concentrations of antelope and mule deer that are 50 head or larger would be avoided while herding horses from the range to the capture site.

As identified in programmatic EA NV-020-7-24, trap sites located

within WSA's shall be constructed on roads or ways and shall not extend farther than 50 feet from the edge of the road or way. Cross country travel would not be allowed in the WSA's.

As identified in programmatic EA NV-020-7-24, a cultural resources inventory would be conducted prior to construction of trap sites. If a cultural site is located, there would be no work conducted at that site unless, the site has been determined to be non-diagnostic or, if a no effect/no adverse effect determination has been made in consultation with the Nevada State Historic Preservation Office.

IV. Consultation

The following individuals were contacted during the preparation of this document.

Dawn Lappin	Wild Horse Organized Assistance
Cathy Barcomb	Commission for the Preservation of Wild Horses
Roy Leach	Nevada Division of Wildlife

Appendix A
Blue Wing/Seven Troughs
Sex Ratios

<u>Whole Herd Ratios</u>				<u>Age 6 and Over Ratios</u>			
<u>Date</u>	<u>Studs:Mares</u>	<u>Ratio</u>	<u>%S:M</u>	<u>Date</u>	<u>Studs:Mares</u>	<u>Ratio</u>	<u>%S:M</u>
1981	470:675	1:1.4	41%:59%	1981	83:207	1:2.5	29%:71%
1985*				1985*			
Winter	1029:1151	1:1.1	47%:53%	Winter	359:344	1:1	51%:49%
Summer	231:239	1:1	49%:51%	Summer	79:61	1.3:1	56%:44%
1987	692:771	1:1.1	47%:53%	1987	221:211	1:1	51%:49%

* The gather was done in two segments as a consequence of the winter gather going into foaling season

DATA SOURCE: Blue Wing/Seven Troughs gather information from 1981 through 1987

Appendix B
Six and Over Sex Ratios
First & Second Selective Removals

<u>HMA</u>	<u>Year</u>	<u>Selective Removal</u>	<u>Ratio of Studs:Mares</u>
Black Rock East	1992	First	1:1
	1994	Second	1.1:1
Little Owyhee	1992	First	1.6:1
	1994	Second	1.1:1

DATA SOURCE: First and second selective removal data from Black Rock East HMA and Little Owyhee HMA following total gathers

Appendix C
 Reproductive Rates
 Pre/Post Selective Removal
 Severe/Mild Winter

SELECTIVE REMOVAL WITH SEVERE WINTER

<u>HMA</u>	<u>Year/Season</u>	<u>Pre/Post Removal</u>	<u>Rate</u>
Buffalo Hills	1992/Fall	Pre-Removal	23.4%
Granite Range	1992/Fall	Pre-Removal	24.7%
Fox & Lake	1992/Fall	Pre-Removal	19.9%
Buffalo Hills	1993/Summer	Post-Removal	4.3%
Granite Range	1993/Summer	Post-Removal	13.4%
Fox & Lake	1993/Spring	Post-Removal	4.2%*
Buffalo Hills	1994/Summer	Post-Removal	14.9%
Granite Range	1994/Summer	Post-Removal	16.5%
Fox & Lake	1994/Summer	Post-Removal	16.8%

SELECTIVE REMOVAL WITH MILD WINTER

<u>HMA</u>	<u>Year/Season</u>	<u>Pre/Post Removal</u>	<u>Rate</u>
Black Rock West	1992/Fall	Pre-Removal	17.6%
Calico's	1992/Fall	Pre-Removal	23.2%
Warm Springs Cyn	1992/Fall	Pre-Removal	22.0%
Black Rock West	1994/Summer	Post-Removal	26.1%
Calico's	1994/Summer	Post-Removal	31.3%
Warm Springs Cyn	1994/Summer	Post-Removal	31.1%

AVERAGE REPRODUCTIVE RATES

<u>HMA</u>	<u>Year</u>	<u>Pre/Post Removal</u>	<u>Rate</u>
Black Rock E & W	1986 to 1992	Pre-Removal	20.1%
Calico's	1983 to 1992	Pre-Removal	21.1%
Warm Springs Cyn	1986 to 1992	Pre-Removal	22.8%
Black Rock E & W	1994/Summer	Post-Removal	26.6%
Calico's	1994/Summer	Post-Removal	31.3%
Warm Springs Cyn	1994/Summer	Post-Removal	31.1%

* Not an accurate overall reproductive rate: determined on Spring data

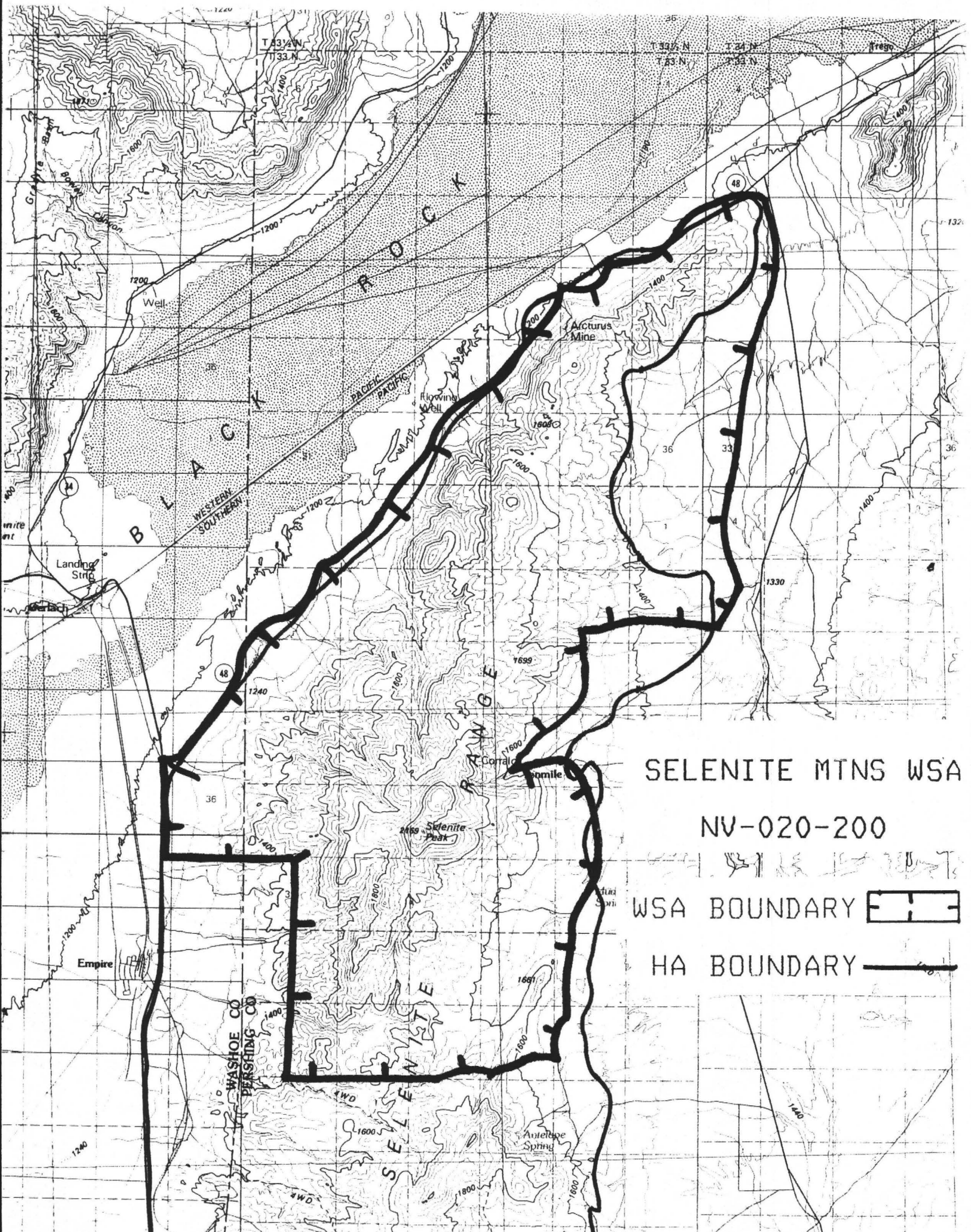
DATA SOURCE: Census and distribution data

Appendix D
Blue Wing/Seven Troughs
Reproductive Rates

<u>Year/Season</u>	<u>Reproductive Rate*</u>
1974/Fall	31%
1980/Summer	19%
1982/Summer	14.5%
1984/Fall	30%
1985/Summer	21%
1987/Summer	24%
1992/Summer	22.7%
<u>1994/Summer</u>	<u>23%</u>
Average	23.15%

* Foals/100 adults

DATA SOURCE: Census data from 1974 through 1994 (Only summer and fall reproductive rates were used - spring rates would not accurately represent the foal crop for the whole year.)

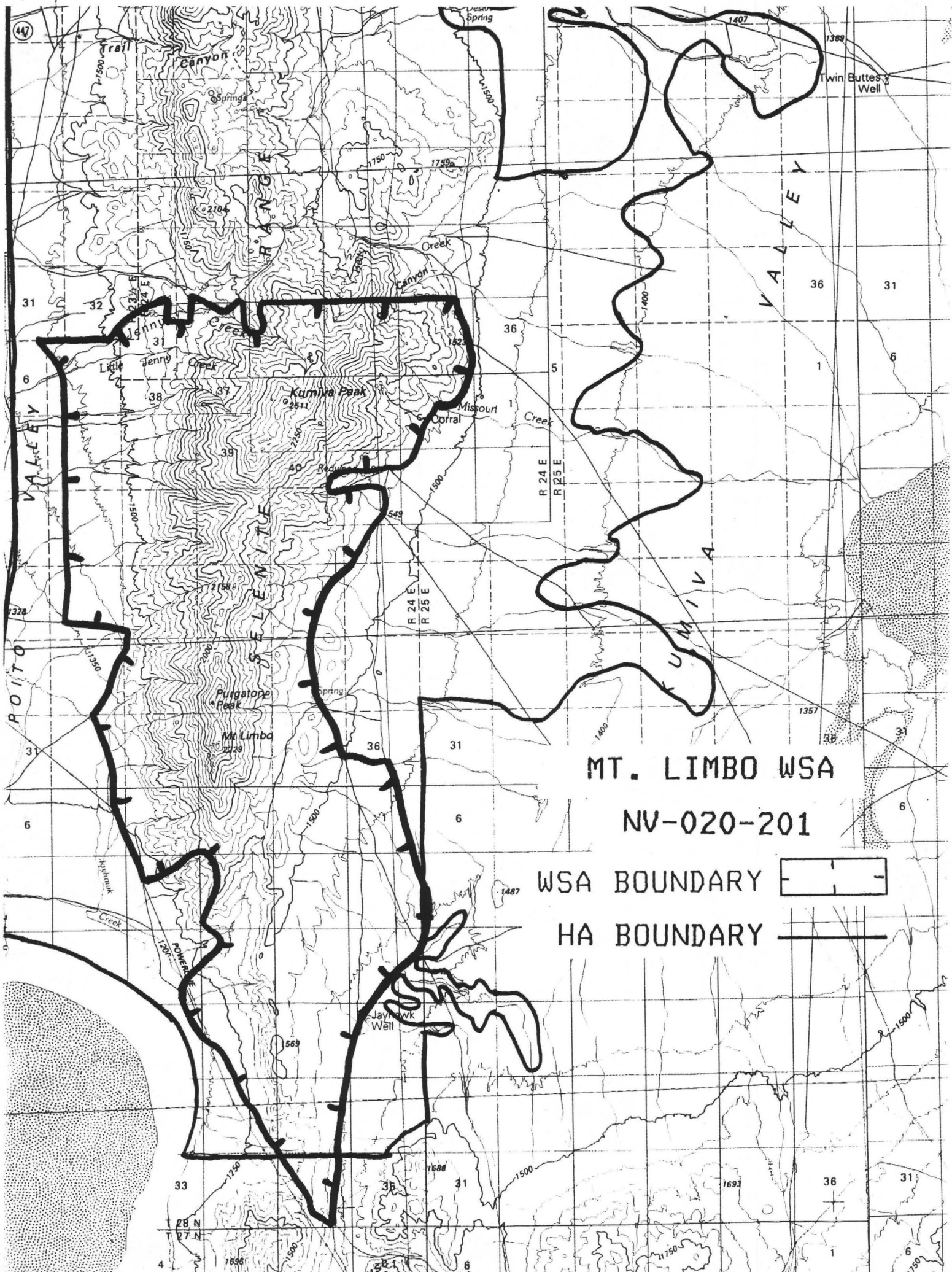


SELENITE MTNS WSA

NV-020-200

WSA BOUNDARY 

HA BOUNDARY 



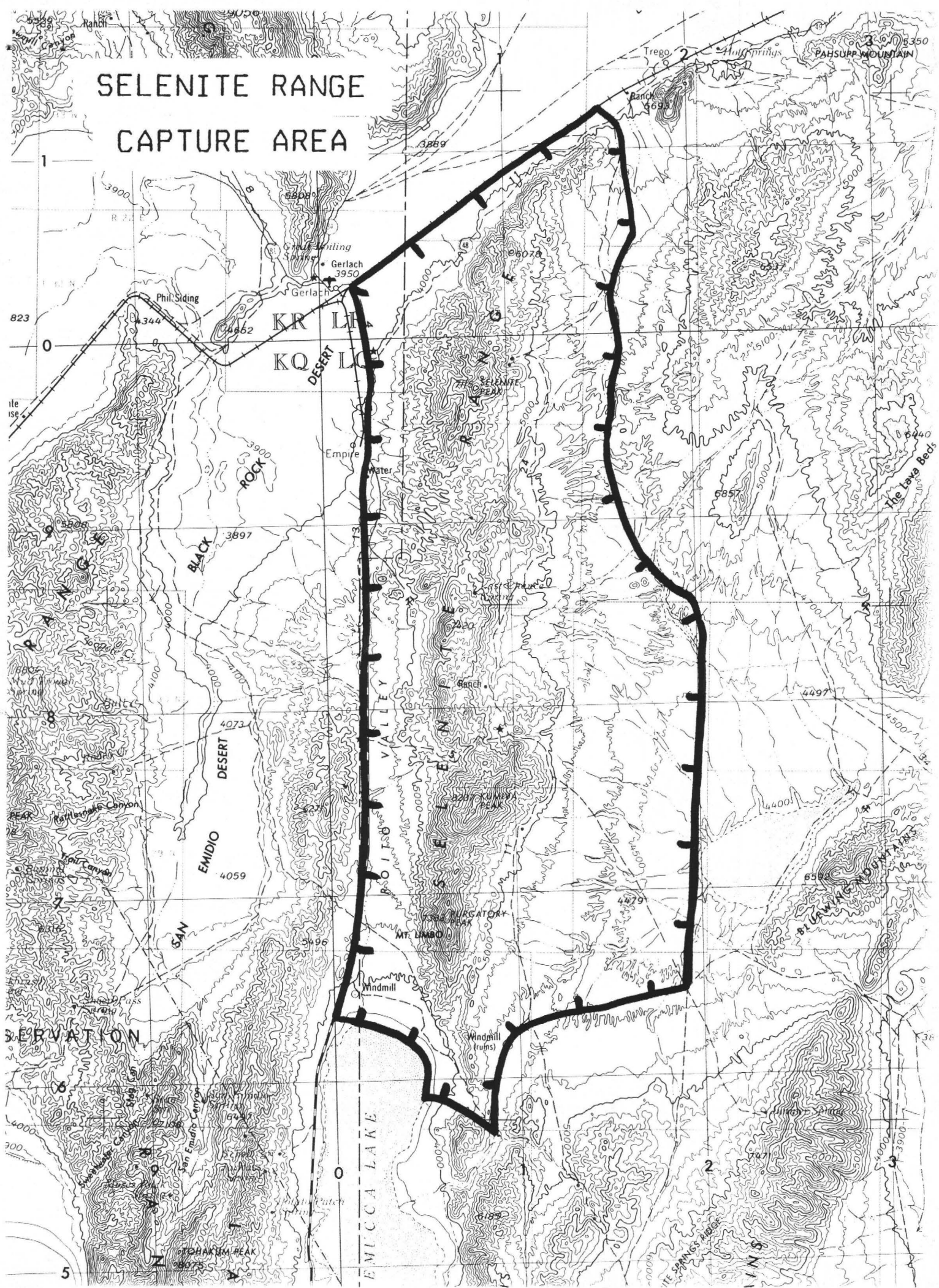
MT. LIMBO WSA

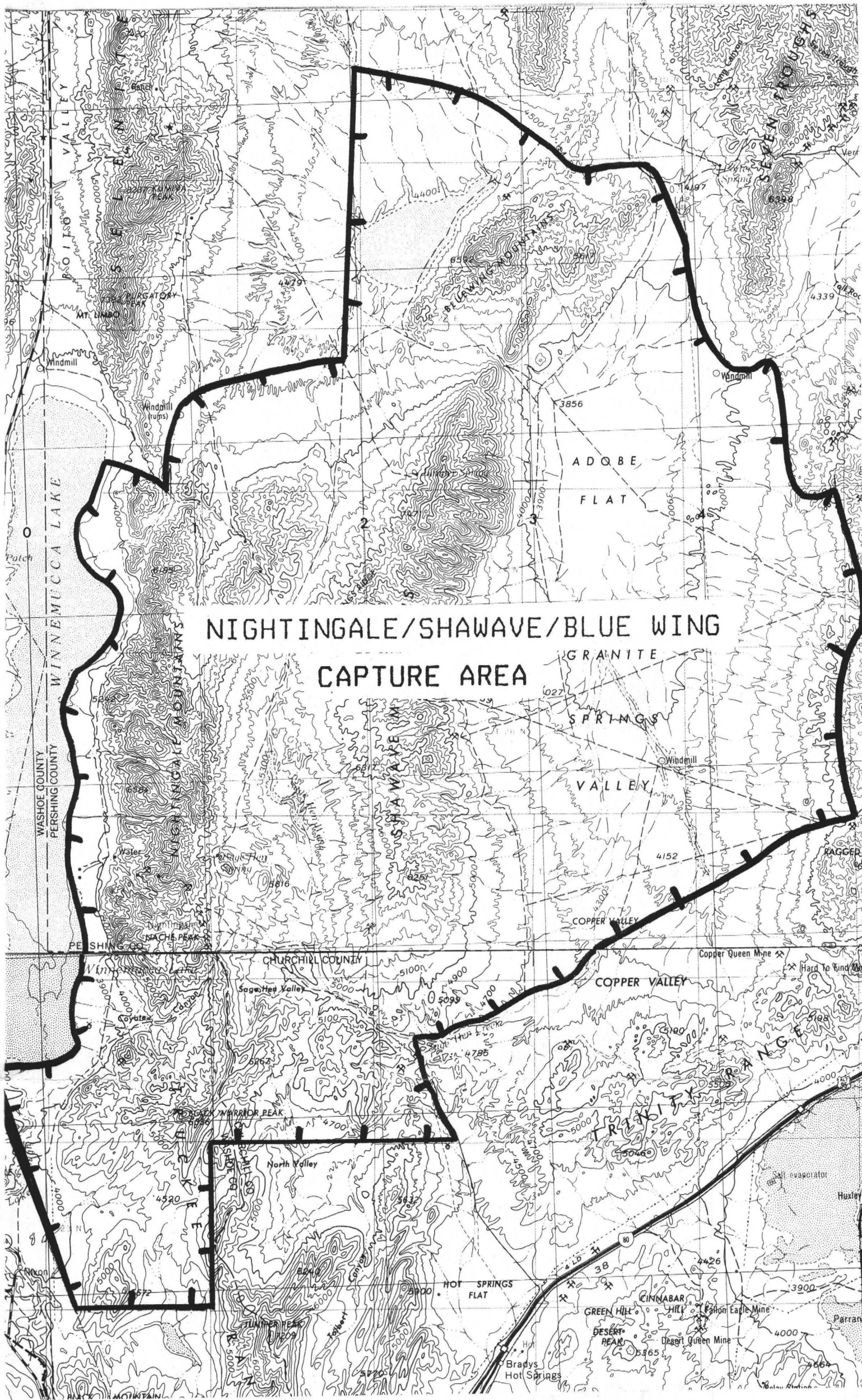
NV-020-201

WSA BOUNDARY 

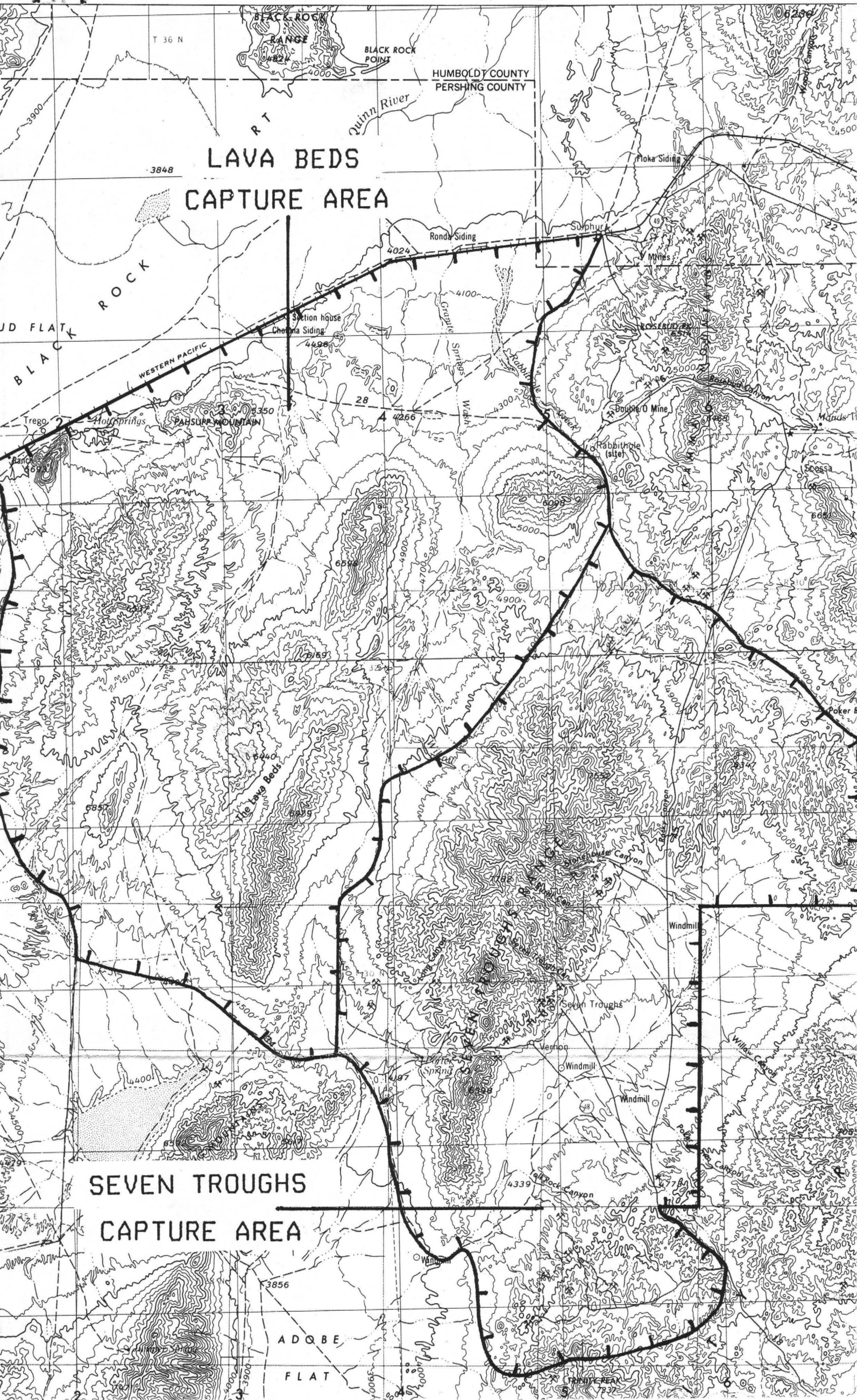
HA BOUNDARY 

SELENITE RANGE CAPTURE AREA





NIGHTINGALE/SHAWAVE/BLUE WING CAPTURE AREA



LAVA BEDS
CAPTURE AREA

SEVEN TROUGHS
CAPTURE AREA

BLACK
ROCK

ADQBE
FLAT



**COMMISSION FOR THE
PRESERVATION OF WILD HORSES**

255 W. Moana Lane

Suite 207A

Reno, Nevada 89509

(702) 688-2626

November 3, 1994

Bud Cribley, Area Manager
BLM-Sonoma-Gerlach Resource Area
705 East Fourth Street
Winnemucca, Nevada 89445

RE: Winter 1995 Wild Horse Removal Plan and EA for Blue Wing Mountains, Lava Beds, Seven Troughs, and Shawave/Nightingale Mountains Herd Management Areas and the Selenite Range Herd Area

Dear Mr. Cribley,

The Nevada Commission for the Preservation of Wild Horses has received and reviewed the 1995 Wild Horse Removal Plan and Environmental Assessment for the Blue Wing Mountains, Lava Beds, Seven Troughs and Shawave/Nightingale Mountain Wild Horse Herds. These herds were significantly reduced by approximately 3,900 horses from 1980 to 1984. It is disappointing that rangeland monitoring data did not indicate a significant improvement in range conditions despite the removal of these animals.

Errors in the computations of carrying capacities and allocation of forage to wild horses were expressed in the Commission's protest to the proposed multiple use decision for this allotment.

We appreciate the disclosure and analysis of data concerning the re-structuring of these herds to meet the Bureau's adoption policy for wild horses. It would appear that the District could establish a criteria for a natural sex ratio in the new re-structured herds. It is encouraging to find that adjacent wild horse herds that have be restructured exhibited reasonable reproduction the following year. The assumption that mares peak in foal production the following year. The assumption that mares peak in foal production from the ages of four through nine could be confirmed with data collected in the 1995 gather. This data would be essential in predicting population growth and future gathers to maintain appropriate management levels.

Bud Cribley, Area Manager
November 3, 1994
Page 2

Longevity of the affected wild horses was not addressed. Capture data from the 1980's could be used to predict longevity and determine herd viability. Longevity criteria could be implemented in the 1995 gather.

Through selective removal criteria was not developed for burros, the wild horse and burro management plan did determine a unique color quality for burros in this allotment. A color criteria for burros could be implemented at the gather.

We hope the above comments will assist you with the final document.

Sincerely,

A handwritten signature in cursive script that reads "Catherine Barcomb". The signature is written in dark ink and is positioned above the typed name.

CATHERINE BARCOMB
Executive Director