G ACTIVITY 4320

UNITED STATES
DEPARTMENT OF THE INTERIOR

Bureau of Land Management

EA FACE SHEET

NV-020-0-38

OFFICE: Winnemucca D.O FY & REPORT # 1980

ACTION: Lava Beds Wild Horse/Burro Gathering NO. OF PAGES
(Project Name, Case Type, etc.)

LOCATION: Lava Beds herd use area SERIAL NO. N- Lava Beds

TEAM SIGNATURES:	TITLE	RESOURCE VALUES ASSIGNED	HOURS
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ENVIRONMENTAL COORDINATOR: _____ _____
(Signature) (Date)

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(Title or Name)

DISTRICT/AREA MANAGER Virden M Stuckley
(Signature)

August 12, 1980
(Date)

Environmental Assessment

I. Description of the Proposed Action and Alternatives

A. Background Data

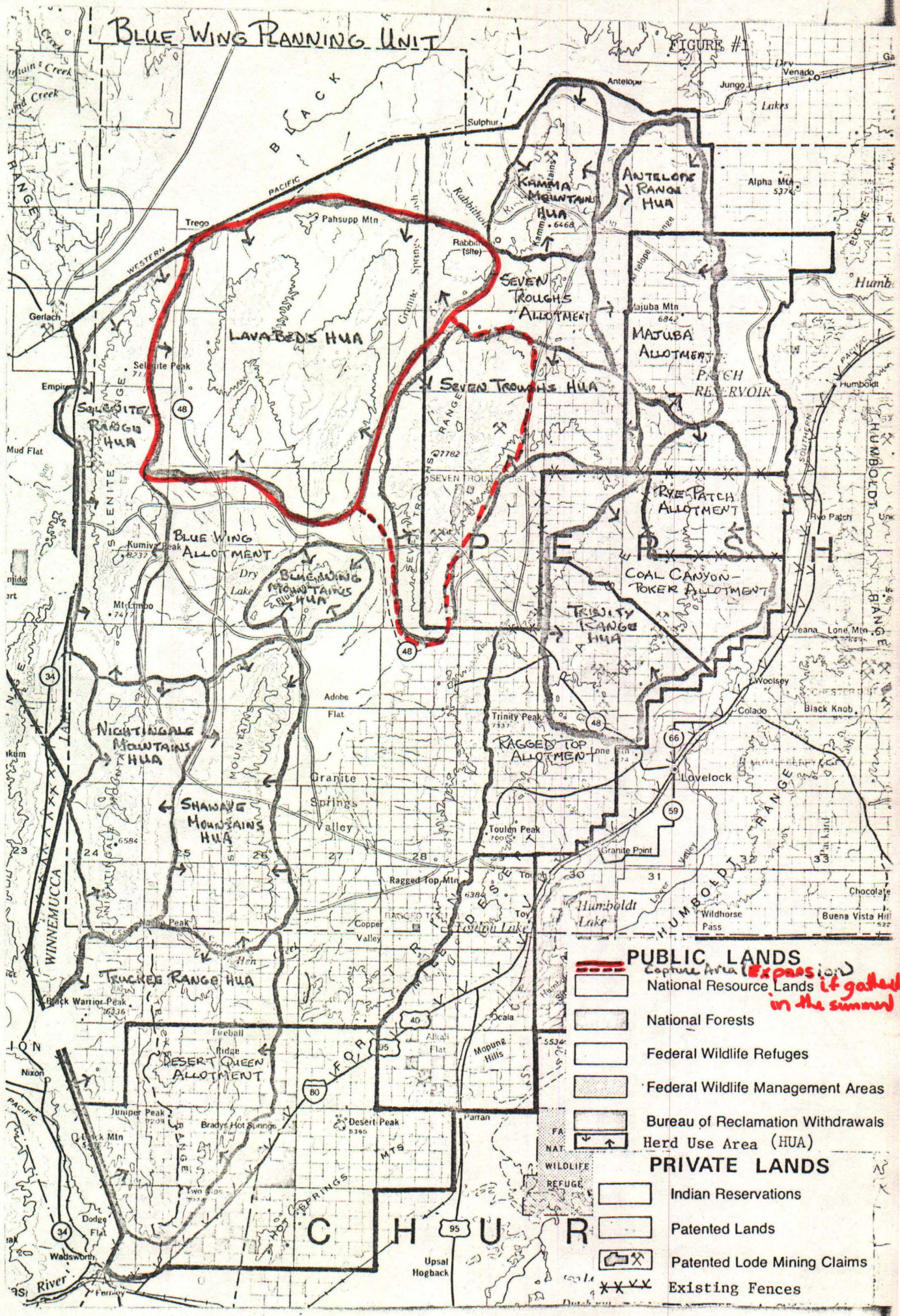
The area to be considered for the proposed wild horse/burro gathering consists of parts of two separate allotments, Blue Wing and Seven Troughs. These allotments are both in the Blue Wing Planning Unit of the Sonoma-Gerlach Resource Area. The allotments were established during the adjudication process by Notice of Advisory Board recommendation and District Manager's Decision dated February 10 and 11, 1966 (Figure #1).

The Lava Beds herd use area (HUA) has an estimated population of 876 wild horses and 42 wild burros. There are three major land masses within the HUA; Dry Mountain, Rattlesnake Ridge, and Lava Beds proper. Generally speaking, the wild horses will be evenly distributed throughout the HUA, depending on the season of use and the availability of water. The majority of the wild burros generally occupy the area at the extreme southeast end of the HUA, just north of the Blue Wing Mountains.

The HUA is comprised of approximately 231,744 acres of public land; 26,822 acres in the Seven Troughs Allotment and 204,922 acres in the Blue Wing Allotment. There are only five acres of private land within the boundaries of the HUA, all in the Blue Wing Allotment.

The initial wilderness inventory completed in September 1979 identified 224,819 acres (approx. 97%) of the Lava Beds HUA as having enough wilderness potential to be included in the intensive inventory. The intensive wilderness inventory completed in April 1980 recommended that this acreage be eliminated from further wilderness consideration (Figure #2). The State Director is scheduled to issue his final decisions on wilderness study areas by November 15, 1980. Until a final decision is made, this acreage will fall under the Bureau's Interim Mangement Policy and Guidelines for Lands Under Wilderness Review (issued December 12, 1979).

The most current inventory conducted in the HUA February 27, 1980, via helicopter, placed the total population at 789 wild horses and 38 wild burros. The adult mares were just beginning to foal at the time of the February inventory. At the end of this year's foaling season, it is estimated that there will be 876 horses and 42 burros.


BLUE WING PLANNING UNIT
FIGURE #1
BLACK ROCK RANGE
PACIFIC
WESTERN
Trego
Pahsupp Mtn
Gerlach
Empire
Selenite Peak
SELENITE RANGE HUA
Mud Flat
LAVA BEDS HUA
Granite Springs
SEVEN TROUGHS RANGE
SEVEN TROUGHS HUA
SEVEN TROUGHS ALLOTMENT
Rabbithole (Site)
Rabbithole Springs
KAMMA MOUNTAINS HUA
ANTELOPE RANGE HUA
Antelope
Jungo
Venado
Sulphur
Alpha Mtn
MAJUBA ALLOTMENT
Majuba Mtn
PATCH RESERVOIR
Humboldt
RYE PATCH ALLOTMENT
Rye Patch
HUMBOLDT RANGE
SOUTHERN PACIFIC
EUGENE
BLUE WING ALLOTMENT
Kumiva Peak
Dry Lake
BLUEWING MOUNTAINS HUA
Mt. Limbo
COAL CANYON-POKER ALLOTMENT
TRINITY RANGE HUA
Trinity Peak
Lone Mtn
Woolsey
Colado
Black Knob
Adobe Flat
NIGHTINGALE MOUNTAINS HUA
RAGGED TOP ALLOTMENT
Ragged Top Mtn
Lovelock
Granite Springs Valley
SHAWAVE MOUNTAINS HUA
Toulon Peak
Granite Point
Humboldt Lake
Wildhorse Pass
Chocolate
Buena Vista Hill
Coppe Valley
Toulon Lake
WINNEMUCCA MOUNTAINS
TRUCKEE RANGE HUA
Black Warrior Peak
Fireball Ridge
DESERT QUEEN ALLOTMENT
Nixon
Juniper Peak
Brady's Hot Springs
Desert Peak
Parran
Alkali Flat
Mopung Hills
FA NAT WILDLIFE REFUGE
Dodge Flat
Wadsworth
Fernley
Upsal Hogback
CHURCHILL
PUBLIC LANDS
Capture Area (Expansion)
National Resource Lands if gathered in the summer
National Forests
Federal Wildlife Refuges
Federal Wildlife Management Areas
Bureau of Reclamation Withdrawals
Herd Use Area (HUA)
PRIVATE LANDS
Indian Reservations
Patented Lands
Patented Lode Mining Claims
Existing Fences

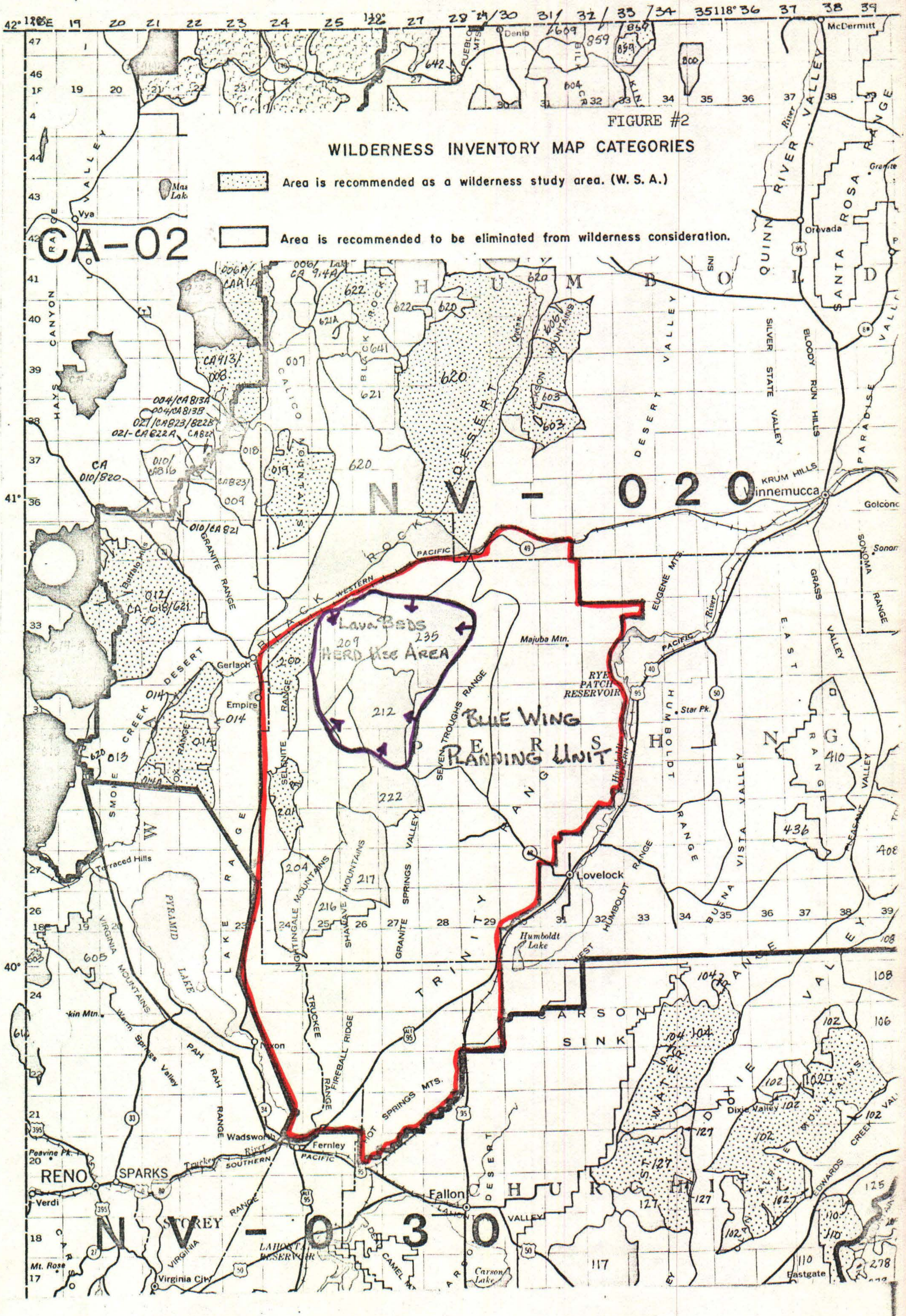


FIGURE #2
WILDERNESS INVENTORY MAP CATEGORIES
Area is recommended as a wilderness study area. (W. S. A.)
Area is recommended to be eliminated from wilderness consideration.
CA-02
NV-020
NV-030
Lava Beds
HERD Use AREA
BLUE WING
PLANNING UNIT
Gerlach
Empire
Lovelock
Fallon
Fernley
Wadsworth
Nixon
RENO
SPARKS
Verdi
Virginia City
Winnemucca
McDermitt
Orovada
Denio
Vya
PYRAMID LAKE
Humboldt Lake
Carson Lake
RYE PATCH RESERVOIR
LAHONTAN RESERVOIR
Majuba Mtn.
Star Pk.
KRUM HILLS
Eastgate
Dixie Valley

The total estimated carrying capacity for the HUA is 5,607 Animal Unit Months (AUMs). The active livestock grazing preference for the HUA is as follows:

Operator	Class of Livestock	Period of Use	# AUMs Active Preference
C-Punch Corp.	Cattle	Yearlong	600*
B.G. Bunyard	Sheep	12/12-3/25	1,380
		TOTAL	1,980

The 1980 total grazing use demand is listed below:

Species	AUM Demand
Livestock	1,980
Wild Horses/Burros	10,512/504
Deer	145
TOTAL	13,141

Subtracting the current forage demands from the total estimated carrying capacity, the net result would be on overobligation of 7,534 AUMs, or 134%:

5,607	Total Estimated Carrying Capacity
-13,141	Total Estimated AUM Demand
- 7,534	Overobligation for the HUA

In late June 1979, Rodger Bryan flew the majority of HUA in a fixed-wing aircraft to determine areas of use at this time of year and to check on the condition of the wild horses/burros. He noted that the animals appeared to be in fairly good condition but that severe trailing was occurring and there was a noticeable lack of vegetation in the interspaces between the sagebrush plants (See Photos 1-2).

An on-the-ground investigation followed, by Rodger Bryan and Paul Jancar, August 1, 1979, to detemine the extent of damage occurring to the forage resource. They found the perennial grass plants showed a lack of vigor in addition to dead centers on most of the plants. They also discovered heavy utilization of last year's growth on both grasses and shrubs (See Photos 3-6).

*Currently taking approximately 3,000 AUMs of voluntary non-use in this area.

In May 1980, Rodger Bryan and Robert Neary, inspected the HUA to determine utilization of the forage and overall condition of the range and the wild horses. They found that between 80-100% of the previous year's growth had been utilized on the majority of the perennial grasses and that many of the plants exhibited severe pedastalling (see photos 7-12).

In general, all of the observers noted that the range condition was poor, with a marked decrease in perennial plants and severe hedging or other browse species. The severe degree of utilization and poor range condition are attributed to both wild horses/burros and domestic livestock. The cattle and wild horses/burros use the area yearlong, whereas the sheep utilize the area in the winter, and early spring.

The Unit Resource Analysis (URA) and the Management Framework Plan (MFP) for the Blue Wing Planning Unit were completed in 1969. Prior to the passage of the Wild Free-roaming Horse and Burro Act on December 15, 1971, wild horses could be captured under state or local law. Federal land managing agencies had no responsibility for these animals. As the numbers of wild horses and burros increased, they were viewed as competition for forage and were often destroyed or captured and processed for commercial gain. The Act was passed to recognize and protect these animals.

No forage was recommended for wild horses/burros, and very little for wildlife during the 1960s adjudication, but approximately 5,100 AUMs were allocated to domestic livestock in the HUA.

Section 14 of Public Law 95-194, the "Public Rangelands Improvement Act of 1978," states that the Secretaries of 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)." The URA and MFP for the Blue Wing Planning Unit was updated in FY 80. The Environmental Impact Statement (EIS) is scheduled to be completed in FY 81 and the District Manager's Decision (MFP III) is scheduled to be final December 30, 1981. After this decision is final, the management plans for the wild horse/burro program will be implemented. Until this time all gatherings will follow interim management guidelines.

B. Proposed Action

The proposed action is as follows:

1. Remove approximately 786 wild horses and 12 wild burros, which would reduce the herd to interim management levels of 90 and 30 head respectively.

2. The cattle operator will be required to maintain his herd at 50 animals, which will require periodic monitoring to remove excess numbers that stray into the area which is unfenced.

3. The sheep operator will be required to remove his animals at the end of February each year, and the area of use will be changed to include more of the valley floors. This will involve the suspension of approximately 333 AUMs.

4. An additional 10 wild horses and 5 wild burros will be captured, marked (i.e., wide colored canvas neck collars, electronic collars, ear tags, etc.), and rereleased for study purposes.

The modifications in domestic livestock use will remain in effect until such time as the key perennial forage species have recovered from overutilization. This would occur when the key species regain the necessary vigor and reproductive capacity to allow 50% of the key plants to produce seed. The proposed action will help the range condition to improve until the MFP decision allocates the available forage.

If a current inventory is not available, one will be conducted preceeding the gathering to confirm the exact number of animals to be removed.

Implementation of the gathering plan will involve the construction of traps and trap wings, the movement of horses by use of a helicopter, the transportation of horses from the traps to holding corrals, and the holding of horses in the corrals. Improvements on existing identified roads will be initiated as the need arises.

Access will be gained using existing roads and ways identified in the wilderness inventory (Figure #2).

The habits and locations of the horses varies with changes in season and availability of forage. For these reasons exact location of each trap will not be known until the habits and location of the horses are determined immediately prior to the capture process. At that time there will be an amendment to the EA covering the location, access required, and the number of miles and/or acres that would be disturbed.

The traps will generally be circular (100' in diameter) and constructed out of approximately 90-100 portable panels 6' to 7' in height, constructed from 1 1/2" steel pipe. Each trap will have, in addition, a small holding corral (100' in diameter maximum) adjoining the trap. This corral will also be circular and constructed from identical portable panels.

The start of each wing will be constructed from portable panels (6' to 7' high). The remainder of the wing will be constructed from white rope stretched on 6 1/2" steel fence posts. The fence posts will be spaced from 50' to 100' apart, depending upon the terrain.

A portable loading chute will be used at each trap site to load captured horses onto stock trucks that will transport the animals.

Support facilities and structures will be located outside the boundaries of the wilderness study area.

Approximately four traps will be located in the wilderness study area. There will be a 1/4 to 1/2 an acre of soil and vegetative disturbance at each trap site. It may be required to travel a short distance cross-country to gain access to the trap site.

By tagging or placing a colored collar on a few wild horses and then releasing them back in the capture area wild horse habits can be more easily monitored. Information such as migration and/or movement patterns, social structures, survival and death loss, foal production and survival of the wild horse herds can be obtained by implementing the tagging program. This information will be useful in management of the horses in the future.

Once the capture is completed at a site, all materials will be removed and reclamation of the disturbed area will begin where appropriate.

The actual capture process would be scheduled to begin during the summer of 1981, depending on the availability of funds and manpower and would continue until the proposed number of horses/burros are captured.

C. Alternative to the Proposed Action

1. Alternative I: No action. This would allow continued overutilization of the range resource by both livestock and wild horses/burros. The populations of horses/burros would fluctuate at a natural rate dependent upon reproduction potential, mortality rates, disease, and the limited range resource.

2. Alternative II: Proportionate reduction of domestic livestock and wild horses/burros to meet the carrying capacity. This alternative would require removal of additional horses and/or livestock in subsequent years to maintain the demand on the forage at the carrying capacity. Wilderness considerations are the same as in the Proposed Action.

3. Alternative III: Total removal of wild horses/burros without reductions in domestic livestock numbers. Wilderness considerations are the same as in the Proposed Action.

4. Alternative IV: Total removal of domestic livestock without reductions in wild horses/burros. No anticipated impacts on wilderness characteristics.

5. Alternative V: Reduce the wild horse/burro numbers to interim management levels of 90/30, respectively, and don't alter the present domestic livestock use. Wilderness considerations are the same as in the Proposed Action.

6. Alternative VI: Reduce the wild horse/burros numbers to interim management levels and allow domestic livestock numbers to increase in succeeding years at the same rate as the wild horses (estimated to be a net increase of 11%/year) until the carrying capacity is reached.

II. Affected Environment

A. Climate and Air Quality

1. Climate

The climate in the HUA is characterized by warm dry days, cool nights, and low precipitation. Local dissimilarities are caused mainly by storm pattern-latitude-elevation interactions. Actually, the annual precipitation and temperature varies with the rise in elevation, and even though good extrapolation from record stations is possible, some mountain range climates are significantly different at the same elevations.

Temperatures in the valley floors will range from 112¼F to -35¾F. The higher mountainous areas within the HUA are generally cooler, reaching maximum temperatures of 80-85¾F. The near minimum is usually below freezing from October 1 to April 1 with a period of 10 degree to 30 degree weather most winters.

Prevailing winds are from the west and average around 7 to 8 miles per hour, but 55 mile an hour gusts are not uncommon.

2. Air Quality

Present air quality in the Lava Beds HUA is high, except for periods during the spring and early summer months when particulate concentrations (dust) become excessive.

During winter, stagnated air masses often remain over the region for two or more days, preventing vertical atmospheric movement, and thus causing atmospheric mixing depths to remain shallow. This condition is prevalent from November through January.

Occasionally dust storms resulting from low pressure frontal systems moving easterly through the area, cause a degradation in air quality, especially during the spring and early summer. When wind speeds reach high velocities, excessive dust is carried from the surface of barren playas, unsurfaced roads, and other unvegetated areas.

B. Geology, Topography, Minerals, and Alluvial Valleys

1. Geology

The name "Lava Beds" is actually a misnomer, for the hills are composed chiefly of cretaceous granodiorite, bordered on the north and south by metasediments of Triassic Auld Lang Syne Group and by Pliocene sedimentary units. Isolated outcrops of Quarternary basalt occur on the extreme northeast end of the Lava Beds, situated near a low point between the Lava Beds and its geologic and topographic continuation--Rattlesnake Ridge. Rattlesnake Ridge is not marked as such on any presently used map. The central part of Rattlesnake Ridge is again Cretaceous granodiorite and, likewise, is flanked on the north and south by Triassic metasediments and on the west by Pliocene sedimentary rocks. The highst points in the Lava Beds and Rattlesnake Ridge lie at elevations of 6,979 and 6,598, respectively.

2. Topography

The Lava Beds HUA is in the Basin and Range physiographic province. The province is a closed hyrdrologic unit and is typified by north trending fault block ranges, alternating with flat floored valleys. Outstanding features are the abrupt mountain ranges, the large, flat, or nearly flat

valley floors, and large sinks or ancient lake beds. The area has a combination of drainage patterns, but the majority flows into the Black Rock Desert to the north and Adobe Flat and Dry Lake to the south.

Valley floors in the area characteristically have slopes ranging from nearly flat to 4-8 percent. The mountain slopes tend to be steep and narrow having been subjected to wave action in the past. The transitional bench areas vary from 5 to 30 percent slopes.

3. Minerals

The entire Lava Beds area is contained within the Staggs Mining District. Gold, silver, lead and tungsten have been produced in the district. Mining activities are not known to have occurred in the Rattlesnake Ridge area. There is an active cyanide-gold leach operation at Twin Butte Mine, T. 30 N., R. 36 E., Sec. 1.

4. Alluvial Valleys

Basically, there are four unnamed alluvial valleys in the HUA - west of Dry Mountain; south of Dry Mountain, and west of the Lava Beds proper; west of Rattlesnake Ridge; east of Lava Beds proper and Rattlesnake Ridge. The soils are generally categorized as fine-loamy and occur on 2-8 percent slopes. The soil temperature regime in these alluvial fans is characterized by cool winters and warm summers. The mean annual soil temperature at 20 inches depth is between 47°F and 59°F.

C. Soils

A Phase I Inventory of the Watershed Conservation and Development system was conducted in the early 1970s. This inventory was used to determine the erosion condition class by means of soil surface factor (SSF) 1/.

A breakdown of the HUA by class follows:

Erosion Condition Class/SSF	% of HUA
Stable/0-20	0
Slight/21-40	25
Moderate/41-60	70
Critical/61-80	5
Severe/81-100	0

1/ For a definition of SSF, refer to the Watershed Section (.45) of the Step II URA.

Soils data, such as descriptions, erosion potential, and reclamation on potential, are best compiled with the use of intensive soil survey. Unfortunately, the Lava Beds HUA has no such soil survey. The best data available for indicating soil erodibility and potential is the vegetal-soil factor based on a phase I watershed inventory.

The vegetal-soil factor 1/ was developed by weighing values for vegetal cover density, effective root depth, and soil surface factor (ssf) to derive three rating levels of environmental concern, development, and management potential.

The implications of the vegetal-soil rating factors, as stated in BLM Manual 1605, Appendix 5 (.35A), are as follows:

a. Low (1). These lands are generally characterized by: moderate to deep soil root depth (13"+), medium to high vegetal density (31-72%), and a slight to moderate erosion rating (ssf). Many of these lands may be capable of higher vegetal production and a variety of vegetal manipulation practices could be utilized to maximize vegetal production.

b. Medium (2). These lands are generally characterized by: moderate soil root depths (9" to 12"), moderate to severe soil erosion and medium (16-30%) vegetal density. Although some of these lands may be close to relatively stable condition, it would be a fairly delicate balance. There is also the probability that some areas with this rating might eventually shift to a "high" rating if present uses continue unmodified. New or additional uses in the areas included in this rating should only be allowed after careful study and consideration. Opportunity for improvement is fair, but can be primarily achieved by management rather than vegetal manipulation practices. Some project improvement practices could be undertaken on lands within this rating that have soil depths of 11"-12" or when lands with this rating are located in higher precipitation zones.

1/ The source of the vegetal-soil factor is ADP printout BREM062 which identifies the factor based on phase I watershed inventory (see BLM Manual 7322).

c. High (3). These lands are generally characterized by: shallow soils--2" to 8" in depth, severe to critical soil erosion, and low to moderate (6-15%) vegetal density. These lands are in a continually deteriorating condition and, because of the generally shallow soils, the opportunity for improvement is (except for remote possibilities of chemical spraying) limited to management. These are lands on which present uses should cease or be studied for possible modification or reduction. No new soil-disturbing activities should be considered without detailed analysis and a guarantee that full remedial action will be an integral portion of the activity proposed.

Table 1 shows the approximate percent distribution of the three vegetal-soil factor classifications in the proposed capture area.

Table 1. Distribution of Vegetal-Soil Factor.

Vegetal-Soil Factor Class	Approximate Percent
Low	20
Medium	55
High	25
TOTAL	100

As indicated 25% of the area is rated "high". The majority lies within areas of highly erodible, fine-textured soils adjacent to the deserts and playas.

D. Water

The Lava Beds proper contains quite a few developed and undeveloped springs, that contain water most of the year. Dry Mountain and Rattlesnake Ridge have very few springs. All three areas have numerous small reservoirs and catchments that will generally hold water until June.

The availability of water is the primary factor responsible for the distribution of wild horses/burros and livestock in the late spring through late fall months. During dry years, the animals will concentrate around several springs, in the Lava Beds proper.

E. Vegetation

1. Terrestrial

Vegetative types are limited by altitude and precipitation. The dominant shrubs on the valley floors and lower slopes, which constitute the largest vegetative type in the HUA, are shadscale (Atriplex confertifolia), bud sagebrush (Artemisia spinescens), greasewood (Sarcobatus baileyi), and whitesage (Certoides lanata). Plants associated with these shrub species are cheatgrass (Bromus tectorum), squirreltail (Sitanion hystrix), Sandberg bluegrass (Poa sandbergii), annual mustards (Brassica spp.), Russian thistle (Salsola kali), storksbill (Erodium cicutarium), and halogeton (Halogeton spp.).

Big sagebrush (Artemisia tridentata) types are the next most common vegetative type in the HUA. Plants associated with big sagebrush at the low to mid elevations are spiny hopsage (Grayia spinosa), littleleaf horsebrush (Tetradymia glabrata), cheatgrass, squirreltail, Sandberg bluegrass, Russian thistle, milk-vetch (Astragalus spp.), and annual mustards.

There are several low sagebrush (Artemisia arbuscula) types at the higher elevations. Plants associated with this type are cheatgrass, Sandberg bluegrass, squirreltail, bluebunch wheatgrass (Agropyron spictatum), Nevada bluegrass (Poa nevadensis), and Thurber needlegrass (Stipa thurberiana), arrowleaf, balsamroot (Balsamorhiza sagittata), buckwheat (Erigonum spp.), lupine (Lupine spp.), and phlox (Phlox spp.).

2. Aquatic

The majority of the riparian habitat that exists in this area are associated with the springs and seeps. These areas have been severely overgrazed by both livestock and wild horses.

Important plant species common to these mesic areas are:

Trees & Shrubs	Salix spp.	willow
	Prunus virginianus	chokecherry
	Rosa woodsii	wild rose
Grasses & Grass-likes	Poa spp.	bluegrass
	Hordeum spp.	barley
	Phleum spp.	timothy
	Festuca spp.	fescue
	Agrostis spp.	bentgrass
	Deschampsia spp.	hairgrass
	Agropyron spp.	wheatgrass
	Bromus spp.	bromegrass
	Carex spp.	sedge
	Juncus spp.	winegrass
Forbs	Taraxacum officinale	dandelion
	Iris missouriensis	iris
	Achillea lanulosa	yarrow
	Equisetum spp.	horsetail
	Erigeron spp.	daisy
	Aster spp.	aster
	Senecio spp.	groundsel

3. Condition and Trend Studies

Presently, there are no condition and trend studies established in the HUA. Future plans call for the establishment of numerous utilization cages and five or six photo plots to monitor range condition.

4. Sensitive Plants

At this time, there is no evidence of any sensitive plants, Federeal or State listed or proposed threatened, endangered or species of special concern in the HUA. However, there have been no site specific surveys made to determine this.

F. Animals

1. Aquatic

The water-associated birds known to inhabit the HUA are killdeer (Charadrius vociferus), and some species of waterfowl during their annual migrations north and south.

Amphibians found in this area include the Pacific tree frog (Hyla regilla), leopard frog (Rana pipiens), and western toad (Bufo boreas).

2. Terrestrial (Wildlife, Domestic Livestock, Reptiles and Amphibians)

a. Wildlife

Mule deer, wild horses/burros, bobcat, coyote, and are common in this high desert biome. The common small mammals include: black-tailed jackrabbit, desert woodrat, kangaroo rat, pocket gopher, antelope ground squirrel, pipistrelle bat, kit fox, and cottontail rabbit. A variety of other nongame mammalian and avian populations exist in the HUA with widespread distributions.

(1) Mule Deer (Odocoileus hemionus)

Mule deer population densities are low in the HUA. There are an estimated 48 mule deer, using approximately 145 AUMs yearly. 1/

Water is a critical part of the deer range but its importance manifests itself more in the fashion of precipitation rather than in springs, seeps, and creeks. Although they are interrelated, the lack of or deficiency in precipitation causes a deficiency in forage and this in turn seems to be the limiting factor. It is probably as important, if not more important, on summer ranges than winter ranges.

(2) Wild Horses/Burros

The current inventory of the HUA was conducted February 27, 1980. The results of this inventory were 789 wild horses and 38 wild burros. Generally, the horse populations were concentrated in the following areas:

(a) The majority of the wild horses were located on the southern end of Dry Mountain.

(b) Smaller concentrations were located on Lava Beds proper and on Rattlesnake Ridge.

(c) The majority of the wild burros were located in the flats at the extreme southern end of Lava Beds proper.

1/ These numbers are based on figures supplied by the Nevada Department of Wildlife.

The adult mares were just beginning to foal at the time of the February inventory. The current population is estimated to be 876 horses and 42 burros (based on an 11% net increase/year).

Using the estimated current population of wild horse/burro the demand for forage would be 11,016 AUMs.

(3) Birds

Most of the area is suited for ground and shrub nesting birds. The rock shelves and cliffs provide excellent nesting habitat for a variety of raptor species.

Upland game birds that inhibit the HUA on small to moderate sized populations are sage grouse (Urophasianus centrocercus), mourning dove (Zenaidura macroura), chukar partridge (Alectoris chukar chukar), and seesee partridge (Ammoperdix griseogularis).

b. Domestic Livestock

Historically these allotments have been utilized by cattle, sheep, and domestic horses. The domestic horse use was suspended in 1976 to facilitate the orderly administration of the public lands.

In a meeting conducted in the Winnemucca District Office on June 18, 1980, Jiggs Goodwin, manager of C-Punch cattle operation in the Lava Beds HUA, stated that due to the large increase in wild horses and burro numbers in the past five years, he has voluntarily reduced his cow herd from 300 head yearlong to 50 head yearlong in the area (see Appendix I). He stated that here was not enough forage available to keep the cattle in the area. This results in approximately 600 AUMs of active preference and 3,000 AUMs of voluntary nonuse.

The other permittee in the HUA is B.G. Bunyard. Mr. Bunyard runs a sheep operation. His total preference is for 1,505 AUMs. His average active preference for the past three years has been 1,380 AUMs, leaving 125 AUMs in scheduled nonuse.

Total active preference for the HUA is approximately 1,980 AUMs.

c. Reptiles and Amphibians

These animals are very common in this area. The most common species appear to be the sagebrush lizard, collared lizard, Great Basin fence lizard, northern desert horned lizard, Great Basin gopher snake, Great Basin rattlesnake, boreal toad, western aquatic garter snake, and the leopard frog.

3. Threatened or Endangered

At this time, there is no evidence of any threatened or endangered animals, either aquatic or terrestrial, in the HUA. There have been no site specific surveys made to determine this.

G. Cultural Features

1. Prehistoric

There have not been any sites of National Register significance recorded at this time.

2. Historic

As of March 18, 1980, the only site found in the HUA, listed on the National Register of Historic Places, is a small portion of the Applegate-Lassen Trail located in the northeast corner of the range. This action will have no adverse effect on National Register properties.

H. Aesthetics/Visual Resource

Most of the HUA is in a Class IV Visual Resource Management Class with the exception of approximately 28 square miles which is in a Class II landscape. The Class II landscape indicates an area of good scenery while the Class IV represents the typical Nevada landscape.

I. Recreation Resources

1. Existing

The Winnemucca District Recreation Site Inventory and Evaluation compiled between 1964 and 1970 did not identify any "Recreational Sites" in the Lava Beds HUA.

Presently, there are no developed recreation sites administered by the Bureau of Land Management in the Blue Wing Planning Unit. Due to a lack of areas with water, neither camping, picnicking, or fishing are popular activities.

Sighseeing, both zoological and geological offer the visitor the most diverse form of recreation. With the large number of wild horses/burros and granitic rock outcrops, the viewer is afforded every opportunity to explore these resources.

The opportunity exists to hunt upland game, waterfowl, and big game species. The population of upland game species has been rated slightly more than moderate, while the waterfowl and big game populations are low.

2. Potential

Due to the lack of water in the HUA, the potential for the development of future recreational sites is very low. However, the Planning Area Analysis (available at the Winnemucca District Office) for Pershing County states that between 1977-1990 there will be 41% increase in recreational activities.

J. Social Aspects

The value of wild horses/burros has changed in recent years from economic to esthetic and socio-cultural. Wild horses were formerly rounded up and sold for slaughter. This practice is currently outlawed. The Bureau of Land Management now has the responsibility to protect and manage wild horses and burros. Since the use of wild horses/burros is now a nonconsumptive use, it is difficult to attach a dollar value to wild horses. The esthetic and socio-cultural values of wild horses and burros are generally expressed in terms of the value of recreational viewing and the values gained through the enjoyment of others or through the knowledge that wild horses and burro exist on the range whether the individual ever sees them or not (the vicarious value). Due to the absence of data regarding the number of visitor days of recreational viewing and other nonconsumptive uses, it is not possible to derive an estimate for the esthetic and socio-cultural value of wild horses and burros on public rangelands.

Nationwide, the wild horse program is very popular and there is much public sentiment to support keeping the present wild horse/ burro numbers. Statewide and locally, the general attitude toward wild horses is very different. The ranchers consider the horses, if left uncontrolled, a definite threat to the existence of their livestock operations. The Nevada Department of Wildlife and wildlife enthusiasts can see the competition they place on forage and water needed for game species. The most common complaint against wild horses/burros is the fact that they contribute nothing to the economy such as wildlife and livestock do. A balance must be reached that will allow for a thriving and healthy wild horse herd yet will not put stable, income-producing ranches out of business.

K. Economics

The economic impacts of the proposed action and each alternative will be discussed in Section III of this document.

L. Areas of Critical Environmental Concern (ACEC)

Presently there are not any ACECs identified in the HUA.

M. Land Uses (wilderness, transportation, residential, prime or unique farmland)

1. Wilderness

Refer to Section I.A. of this document for a description of HUA as it relates to the present stage of the wilderness review process.

2. Transportation

Access to the majority of the HUA is generally poor. The following is a list of the major BLM and county roads found within the boundaries of the area. For the location of each road, refer to Figure 3.

Name	Number
Lava Beds Road	BLM 2026
Granite Springs Wash Road	BLM 2058
Rattlesnake Road	BLM 2062
Cow Creek Road	BLM 2063
Blue Wing Road	BLM 2084
Duque Springs Road	BLM 2092
Pershing County Road	PE 224

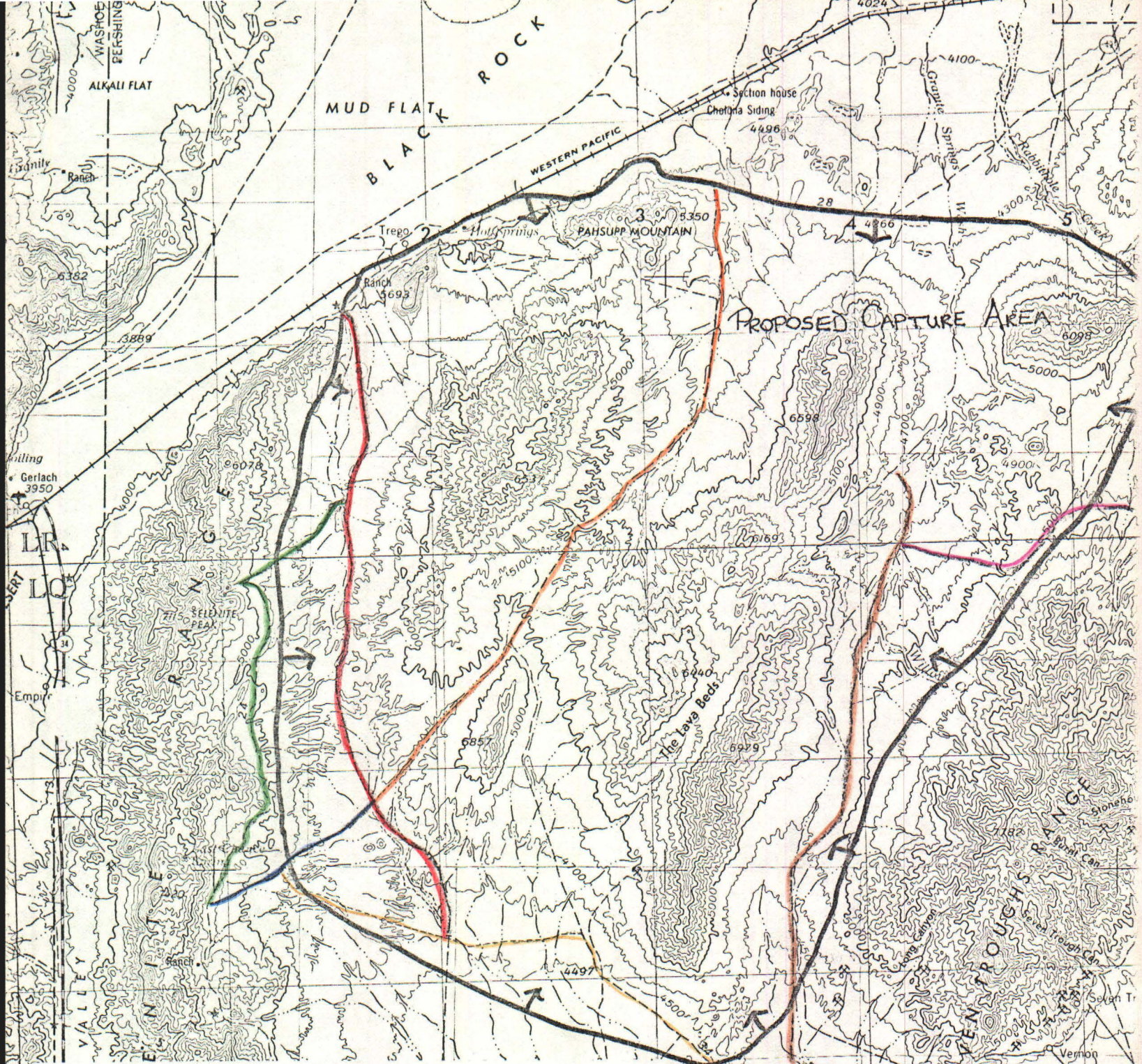


Figure 3.

BIM 2026
BIM 2058
BIM 2062
BIM 2063
BIM 2084
BIM 2092
PE 224

3. Residential

There are no permanent residences found within the bundaries of the HUA.

4. Prime or Unique Farmland

There are no areas located in the HUA currently producing agricultural crops.

III. Analysis of the Proposed Action and Alternatives

A. Proposed Action

1. Anticipated Impacts

Air quality should not be adversely affected by the proposed gathering. There will be periods of time when the gathering will cause dust to be locally heavy, however, these time periods will be short and the areas involved widely scattered. Drive trapping will create some dust as the animals are driven several miles to a trap. Vehicular traffic will create dust because of the heavy use roads will receive, while a particular trap site is used. Dust and the exhaust gases should be rapidly dispelled because the wind is contantly blowing, whether it is gentle or near gale force. Gerlach, to the west, is the closest large town (approximately 15 miles on a straight line). However, the prevailing winds are generally from the west so there should be no impact to the air in any populated areas. In addition, the gathering should only last approximately three months, so impact on the air should be short-lived.

With the removal of a large number of horses much of the pressure on the depleted forage resource should be removed. As recovery proceeds, native grasses and forbs should regain vigor and add organic matter to the soil. Because of the poor condition of the range, it will probably take several years before a noticeable change can be seen. Wind erosion should descrease as soil cover increases.

No detrimental effects are anticipated to any waters. Water quality should improve after the gathering as fewer animals will be using it.

For the socio-economic impacts refer to Section III.A.3. of this document.

The vegetation which supports the wild horse/burro population will improve with the removal of a significant amount of the year-long grazing pressure. All other forage plants (mainly perennial bunchgrass) should respond with increased vigor. These benefits will help to begin restoration of the forage resource. These benefits will be short-lived, however, if further reductions of wild horse numbers do not take place in the following years to insure that the demand on the forage resource is at or below the carrying capacity.

As for the relationship between wild horse reduction and benefits to wildlife, no firm conclusions can be made at this time. It is likely, though, that the decreased pressure on forage resources should benefit mule deer by reducing competition for forage. It is not anticipated that any harassment to mule deer should occur during trapping operations. No known raptor nesting areas exist in the gathering areas so no conflict is anticipated. No threatened or endangered species are known to live in the areas where trapping will take place.

The native perennial bunchgrasses and forbs should begin to regain vigor. It is probable that retrogressive succession would be at least slowed. Complete halt to retrogression is highly unlikely until further grazing pressure, especially during the growing season, is removed through livestock grazing plan modifications. When retrogression is halted, secondary succession can begin. As secondary succession progresses toward climax, the habitat for species such as mule deer and sage grouse should also improve.

The driving of young foals may have an adverse effect on them if they are not moved at a slow enough pace.

Much information can be obtained from the gathered animals. All of this information will be useful in management of the horses in the future. By tagging or placing a colored collar on a few wild horses the opportunity exists to collect data by simple observation and recordation during normal field work by district employees. Information as to migration and/or movement patterns, social structure survival and death loss, and foal production and survival of the wild horse herds can be obtained by implementing the tagging program.

Local public opinion would most likely be strongly in favor of gathering wild horses. National opinion might be entirely the opposite, however, no firm conclusion can be made at this time. With such a large scale gathering planned, it is very probable that it will draw national attention.

The Winnemucca District has an estimated 1980 population of 11,000 wild horses and 180 wild burros. Interim management plans call for the removal of approximately 4,000 horses from six different areas over the next two years. The Lava Beds gathering will reduce the total population by 7%. It will also reduce the number to be gathered by 20%.

The gathering operation will cause some stress and possible injury to the horses. Previous gatherings in the Winnemucca District have resulted in the capture of 3,800 wild horses. Of the 3,800 animals, 49 or 1.3% had to be destroyed for various reasons. The majority of these animals injured themselves once inside the trap facilities. Based on this percentage, it is estimated that approximately eleven animals will have to be destroyed because of injuries incurred from the gathering.

It would be impossible to determine the amount of recreational use that comes into the area because of these wild horses. Because of the large number of horses on the district, the removal of approximately 800 would not have a great impact on the recreational values.

2. Possible Mitigating Measures

a. Archeological clearance will be done on all trap sites prior to their construction. If archeological values are present, trap sites will be moved. Traps will not be placed near any of the identified historic sites. The State Historic Preservation Officer will be notified before any action is taken.

b. A Bureau employee will make a careful determination of a boundary line to serve as an outer limit within which attempts will be made to herd horses to a given trap. Topography, distance, and current conditions of the horses are factors that will be considered to set the limits so as to avoid undue stress on the horses while they are being herded.

c. All corral panels will be from 72" to 84" high in order to prevent horses from jumping out of traps.

d. Brutality to horses in any form will not be tolerated. Any employee who mistreats any horse will be dismissed immediately from the roundup operation.

e. The helicopter shall be under the direct supervision of a duly authorized BLM employee. He must be able to communicate with the pilot and be able to direct the use of the helicopter so as to observe the effects on the well being of the animals.

f. Only experienced horseback riders will be used in the gathering operations.

g. All saddle horses will be properly shod and over three years in age. All saddles and tack will be in good repair.

h. Equine Infectious Anemia (EIA) samples will be taken at the holding facilities at Carson City.

i. Only experienced drivers will be used to transport the horses to the holding facilities.

j. The helicopter will have radio communication with the Authorized Officer or his designated representative at all times.

k. The United States Fish and Wildlife Service and the Nevada Department of Wildlife will be notified before any action is taken.

l. Disturbed ground around each trap site will be rehabilitated in such a manner that is determined feasible by the District Soil-Water-Air Specialist.

m. A qualified Bureau employee will clear all sites prior to construction, to insure that a trap will not significantly impact any Federal or State listed or proposed threatened or endangered plant species. If significant disturbance is anticipated, the trap site will be moved.

n. A veterinarian will be on call at all times during the roundup operation. The veterinarian will never be more than 100 miles from the roundup operation. In an emergency, the veterinarian could be helicoptered in, arriving in one to one and a half hours.

o. Every effort will be made to locate a trap near existing horse trails so that once the animals are started towards the capture area they will be able to pick a natural route and proceed at their own pace.

p. Allowances are made for high temperatures so that horses are not driven long distances in hot conditions.

q. All of the proposed trap sites will conform with the Bureau's Interim Management Policy and Guidelines for Lands under Wilderness Review (issued December 12, 1979).

3. Adverse Impacts That Cannot Be Avoided

Vegetation destruction and soil compaction on and around trap sites would occur.

Total suspension of domestic livestock use is as follows:

Operator	AUMs Suspended
C-Punch Corporation	Approximately 3,000
B.G. Bunyard	Approximately 333

The C-Punch Corporation operation has 21,460 AUMs of active preference in the Blue Wing Allotment. Three year average licensed use in the allotment has been approximately 2,000 AUMs less than active preference. The operation has 4,404 additional preference AUMs in another allotment in the resource area. C-Punch has voluntarily suspended use of approximately 3,000 AUMs in the area affected by the proposed action. Continued nonuse of these AUMs should not significantly impact the C-Punch operation. 2,000 of the AUMs would be absorbed by the difference between the year average licensed use and active preference while the remaining 1,000 AUMs (already voluntarily suspended) represents only four percent of three year average licensed use for the two allotments in which C-Punch has grazing privileges.

The B.G. Bunyard operation would probably be significantly impacted by the proposal. This operation has 1,505 AUMs of active preference in the Blue Wing Allotment. License use over the past three years have average approximately 1,400 AUMs. The proposal would suspend approximately 333 AUMs, which represents 24 percent of licensed use. The greatest impact of the proposal however results more from the change in the period-of-use than from the suspension of AUMs along. The period-of-use would be changed from the existing period which runs from 12/12 to 3/25 to a new period which would run from 12/12 to 2/28, a loss of 25 days in March.

The B.G. Bunyard outfit has grazing privileges in both the Susanville and Winnemucca BLM districts. Susanville grazing privileges represent the operation's summer range (licensed use in the district generally runs from 4/01 to 12/08) while the Winnemucca privileges represent its winter range. The suspension of grazing privileges in the Winnemucca District during March will require that the operation find an alternative source of feed for the month of March. An alternative source of feed will probably come from private sources which would mean that the operation would incur additional operating expenses. Private pasture rental or lease is one method of providing an alternative feed source. Commerical rates for private AUMs range from $7 to $10 while the rate for BLM AUMs is $2.36, a difference ranging from $4.64 to $7.64 per AUM. Providing the 333 AUMs needed to offset suspended BLM AUMS by private pasture rental would result in additional operating expenses ranging from $1,545 to $2,544. If private pasture is not available for lease, the operator may decide to buy feed to support his sheep during the 25 day period in March. Alfalfa hay currently sells for $110 per ton (Petaluma Market, July 24, 1980). On the basis of 2.5 AUMs per ton, the additional expenses incurred from this feed source would amount to approximately $13,900.

The ability of the operator to survive the increase in operating costs resulting from the need to find alternate sources of feed is unknown.

The gathering operation will cause some stress and possible injury to the wild horses/burros. It is anticipated that of the proposed 800 animals to be gathered, approximately 11 will die or have to be destroyed at the capture sites for various reasons.

B. Alternative I: No Action.

1. Anticipated Impacts

The only effect on air quality might be the long-term increase in dust as the soil binding perennial grasses are overgrazed and killed.

As vegetative cover is removed, especially the perennial grasses, soil protection from plant cover will descrease. Erosion, especially from wind would most likely increase. Water-caused erosion might also increase. Since soil-forming processes in all semi-desert areas create topsoil at a very slow rate, accelerated soil loss whether by wind or water only degrade the entire community.

Under this alternative, the quality and condition of the range would lower to the point that soil loss would occur and the overall present potential of the soil to produce vegetation would eventually be lost. This will cause a decline in both quality and quantity of wildlife habitat and a decrease in water quality. The continued decline in the range condition would result in both quality and quantity of desirable forage species being less available to all grazing animals. Undesirable vegetation would replace the more palatable species. The productivity of the allotments would deline to the point that large wild horse starvations would occur.

It is presently unknown how much sedimentation to the water is caused by horses using the seeps and springs. Therefore, no conclusions can be made as to whether or not sedimentation will increase if no action is taken.

No action would be detrimental to the vegetative resource which supports the wild horse populations. The winterfat and shadscale areas are severely overgrazed. Further overgrazing may destroy these important wintering areas for decades. In the big sagebrush areas, the native perennial grasses have either been grazed out or are in a low state of vigor. The big sagebrush sites contain far less perennial grass than they would in a high seral or climax condition. Big sagebrush has replaced the grasses and this effectively limits reestablishment of the perennial grasses once they are gone. This degraded habitat is less valuable for mule deer, sage grouse, and most other mammalian and avian species.

If no action is taken to relieve the forage overobligation, retrogressive succession will continue. The whole ecosystem will be degraded until the pressure which causes the degradation is removed. As vegetative cover is removed, soil erosion will increase. This will decrease soil productivity which in turn hinders vegetative recovery. So a cycle is started which will be very difficult to break.

No action will bring a loud outcry from the local population. If the situation on these mountain ranges continues to deteriorate, a large number of horses will die from starvation or diseases caused by weakened condition. This would probably cause an outcry from wild horse protection groups. Thus, the Bureau could very conceivably receive more bad publicity from doing nothing than if it gathers such a large number of animals.

No action will also have an adverse economic and social impact on the local economy in that the operators will have to reduce their livestock numbers to accommodate the excess wild horse numbers. Thus, a reduction of income would indirectly affect the local economy.

No action would also receive a reaction from horse protection groups, as horses on the area would not have adequate forage available to them.

2. Possible Mitigating Measures

Habitat restoration projects (i.e., seedings, sprayings, etc.) may be initiated to provide more forage.

Additional waters may be developed in areas where there currently is none, and the forage is not being utilized.

A season-of-use could be established to lessen the effects of overgrazing on the forage resource.

3. Adverse Impacts That Cannot Be Avoided

All of the anticipated impacts that are described in Section III.B.1. of this document are possible unavoidable adverse impacts.

C. Alternative II: Proportionate reduction of domestic livestock and wild horses/burros to meet the carrying capacity.

1. Anticipated Impacts

This alternative would remove the overobligation of forage, but may not enable the condition of the range to improve. This area is now in poor condition and removing the excess demand may just establish a static trend and continue to maintain the poor condition of the range.

To accomplish balancing the demand with the carrying capacity an estimated 529 wild horses/burros would have to be removed immediately. In subsequent years, approximately 49 horses would need to be removed annual (11% herd increase/year), to keep the demand on the forage at carrying capacity.

Both livestock operations would be subject to a 57% downward adjustment in their present active use. This large of a reduction would be greater than that of the proposed action, and might possibly result in the elimination of the operations in this area.

2. Possible Mitigating Measures

Same as those stated in the Proposed Action and Alternative I.

3. Adverse Impacts That Cannot Be Avoided

Same as those stated in the Proposed Action and Alternative I, except that the impact on the livestock operations will be double that of the Proposed Action.

D. Alternative III: Total removal of wild horses/burros without reductions in domestic livestock numbers.

1. Anticipated Impacts

Section 14 of Public Law 95-514, the "Public Rangelands Improvement Act of 1978," states that the Secretaries of 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)."

In order to determine the appropriate management levels the Bureau of Land Management must pursue its planning system through a Unit Resource Analysis, Management Framework Plan, Environmental Impact Statement, and the District Manager's Decision. The final decision will become public and be in effect December 30, 1981. The planning system will determine the appropriate number of horses to be left on the allotments. As a result, total elimination of the wild horses/burros cannot be considered and this alternative will not be discussed any further.

E. Alternative IV: Total removal of domestic livestock without reductions in wild horses/burros.

1. Anticipated Impacts

Under this alternative, the forage demand by wild horses/burros alone will exceed the estimated carrying capacity by 5,409 AUMs, or 96%.

All of the anticipated impacts discussed in Alternative I will apply under this alternative.

2. Possible Mitigating Measures

Habitat restoration projects (i.e., seedings, sprayings, etc.) may be initiated to provide more forage.

Additional water may be developed where there currently is none, and the forage is not being utilizaed.

3. Adverse Impacts That Cannot Be Avoided

Same as those stated in Alternative I.

F. Alternative V: Reduce the wild horse/burro numbers to interim management levels and don't alter the present domestic livestock use.

1. Anticipated Impacts

Same as the Proposed Action with the exception of the socio-economic impacts to the livestock operations, and the condition of the range will not respond as quickly as under the Proposed Action.

2. Possible Mitigating Measures

Same as the Proposed Action.

3. Adverse Impacts That Cannot Be Avoided

Same as the Proposed Action, with the exception of the socio-economic impacts.

G. Alternative VI: Reduce the wild horse/burro numbers to interim management levels and allow domestic livestock numbers to increase in succeeding years at the same rate as the wild horses (estimated to be a net increase of 11%/year) until the carrying capacity is reached.

1. Anticipated Impacts

The impacts to the range resources will basically be the same as those described in the Proposed Action for the short term.

In five years, the demand on the forage resource will be approximately 5,907 AUMs, which will exceed the carrying capacity by 300 AUMs. At this time, either the wild horse/burro population, or the domestic livestock numbers, or both, will have to be reduced to bring the demand below the carrying capacity.

During this five year period, both the cattle and sheep operations will almost double their present actual use. This would be a substantial economic gain.

This alternative would remove the overobligation of forage for the short term, but it may not enable the condition of the range to improve. The area is now in poor condition and removing the excess demand for a short period of time may just establish a static range trend and continue to maintain the poor condition.

2. Possible Mitigating Measures

Same as the Proposed Action.

3. Adverse Impacts That Cannot Be Avoided

There is a possibility that the range condition and trend will not improve under this alternative, but in all actuality will remain static or continue to go downward.

The gathering operation will cause some stress and possible injury to the wild horses/burros. It is anticipated that of the proposed 800 animals to be gathered, approximately 11 will die or have to be destroyed for various reasons at the capture site.

IV. Relationship Between Short-term Use and Long-term Productivity

Short-term use under existing conditions would have adverse effects on the animals and plant community. Without control of cattle and wild horse numbers, range and watershed conditions would continue to deteriorate, affecting the animals supported by them.

Increased horse numbers would further magnify the conflict between range users and produce a high degree of population stress. Reduction of horse and cattle numbers would help stabilize and/or improve the range and reduce population stress. This benefit would be recognized until horse numbers increase substantially. The ultimate goal is to manage wildlife, wild horses and burros, and livestock in an ecological balance for the maximum use, without jeopardizing the range health and productivity.

The proposed action should have both short-term and long-term beneficial effects on the overall range condition, wildlife habitat, watershed, and water quality on the allotment, when compared to the previous stocking level.

V. Irreversible and Irretrievable Commitment of Resources

There should be no permanent loss of any resources in these allotments because of the proposed gathering.

Possible injury may result to the wild horses from the gathering; if so, the animals would have to be destroyed in a humane way.

VI. Persons, Groups, and Government Agencies Consulted

American Horse Protection Association, Washington, D.C.
American Humane Association, Denver, Colorado
Animal Protection Institute, Sacramento, CA
Marlowe Jevning, Sportsmens Association, Lovelock, NV
C-Punch Corp., Rancher, Los Angeles, CA
B.G. Bunyard, Rancher, Cedarville, CA
Fund For Animals, Phoenix, Arizona
Humane Society of the U.S., Washington, D.C.
International Assn. for the Protection of Wild Horses/Burros, Reno, NV
National Mustang Association, St. George, UT
National Wild Horse Association, Las Vegas, NV
Nevada Cattlemens Association, Elko, NV
Nevada Dept. of Historic Preservation & Archeology, Carson City, NV
Nevada Dept. of Wildlife, Fallon, NV
Nevada State Clearinghouse, Carson City, NV
Nevada Woolgrowers, Ely, NV
U.S. Fish and Wildlife Service, Sacramento, CA
Wild Horse & Burro Committee For National Academy of Science, Logan, UT
Wild Horse Organized Assistance, Reno, NV
Winnemucca District Multiple Use Advisory Council (10)

VII. Public Interest and/or Controversy

See Appendix II for the public comments received on the proposed gathering, and how each was incorporated or considered in the Environmental Analysis.

VIII. Summary Conclusion

Based on the foregoing facts and analysis, it is concluded that the proposed action is the recommended action. It is further concluded that the stipulations and mitigating measures called for in this document be adopted.

IX. Signatures

See EA Face Sheet.

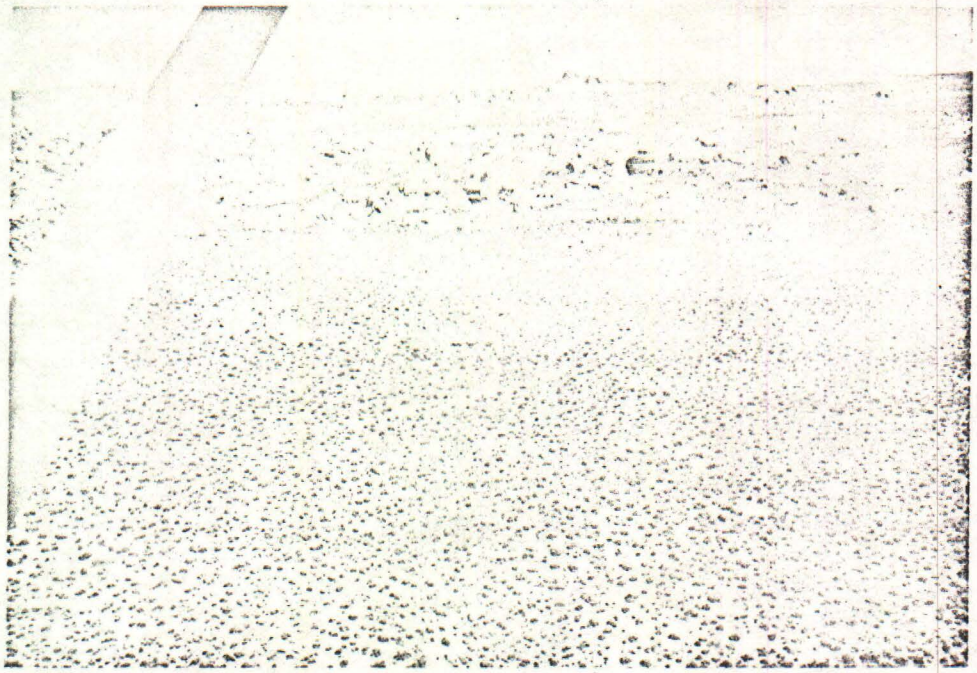


Photo #1. Taken in the Lava Beds proper. Note severe trailing and the lack of vegetation in the interspaces between the sagebrush plants.

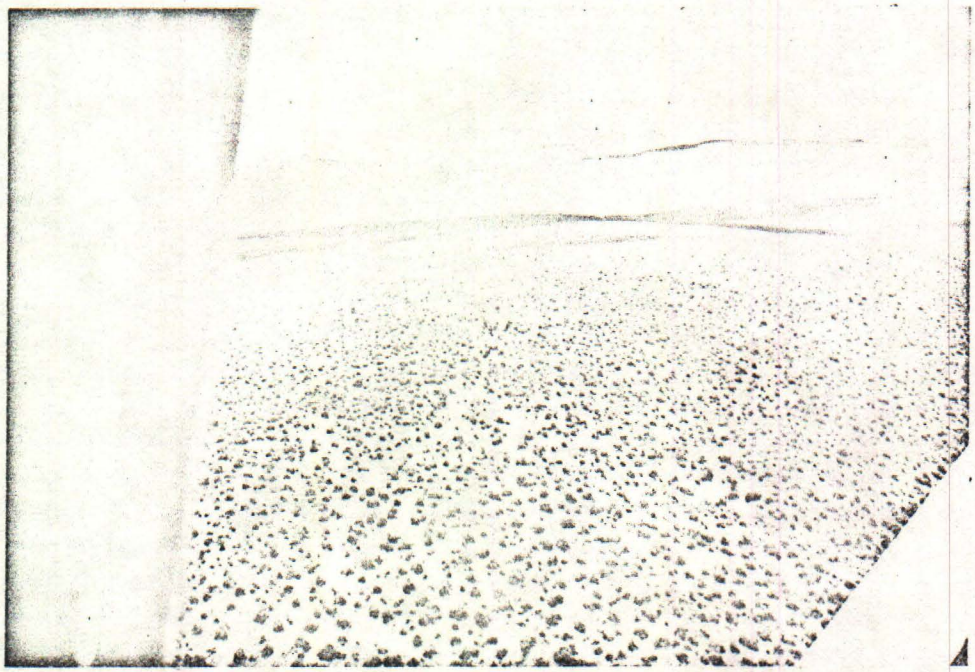


Photo #2. Same as above.

Photo #3. Note the heavy utilization of both this year's and last year's growth on this needlegrass plant. Also note the lack of vigor and the portion of the center of the plant that has died.

Photo #4. Same as above.

Photo #5. Note the heavy utilization of this hopsage plant, to the extent that the plant has almost died.

Photo #6. Same as above.

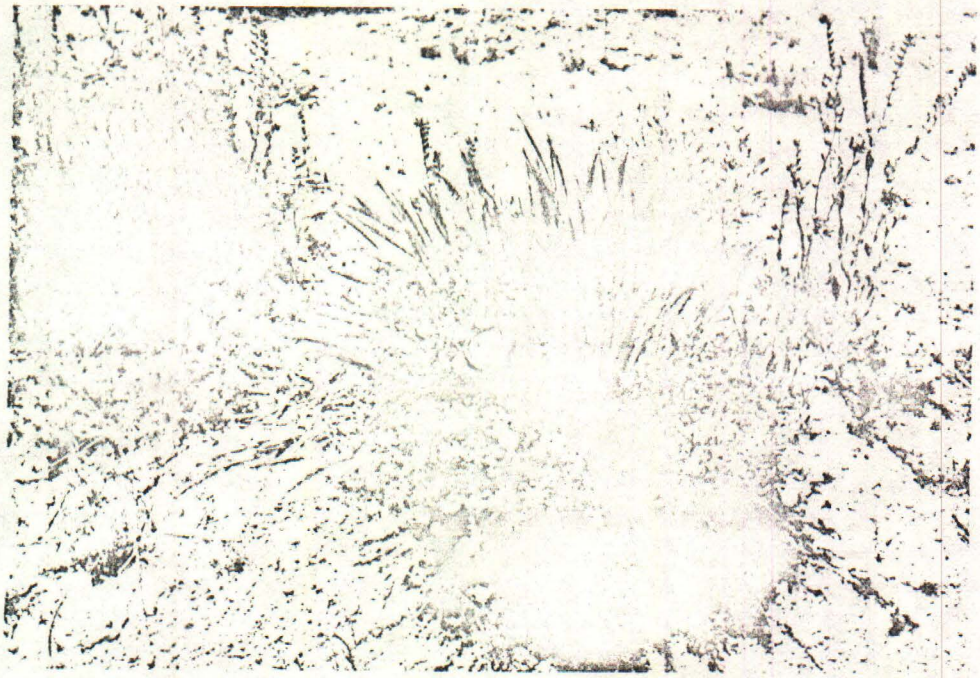


Photo #7. Note the vigor of this bottlebrush squirreltail plant that has grown up through the protected understory of a shadscale plant.

Photo #8. This photograph depicts a typical unprotected squirreltail plant. Note the lack of vigor and the heavy utilization of last year's growth.

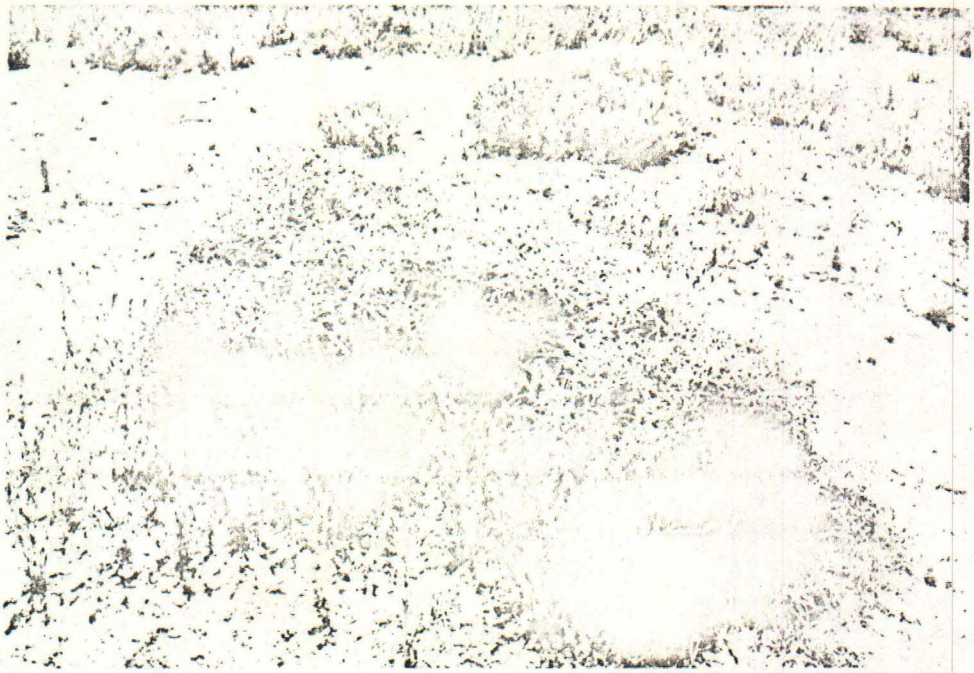


Photo #9, Note the severe hedging on this Dalea plant. It was not possible to determine if this was done by cattle or horses.

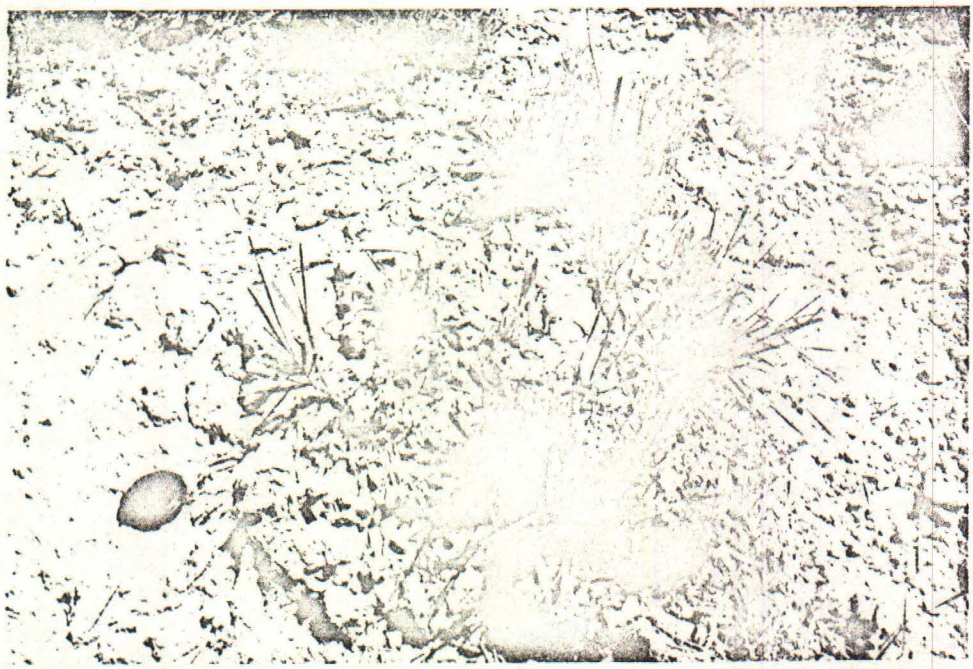


Photo #10, This Great Basin wildrye plant has been heavily utilized to the point where pedestalling is occurring.

Photo #11. This squirreltail plant is beginning to exhibit extreme pedestalling. Note the lack of vigor and the dead center of the plant.

Photo #12. Again, note the heavy utilization of this and last year's growth, lack of vigor, and dead center of this bluegrass plant.

Appendix I

★ U.S. GOVERNMENT PRINTING OFFICE: 1980-682-599

UNITED STATES GOVERNMENT

Memorandum

DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

IN REPLY REFER TO:
4700/1791
(N-027.8)

To : Acting District Manager, Winnemucca

Date: July 13, 1980

FROM : Rodger T. Bryan, Natural Resource Specialist

SUBJECT : Summary of Comments from the Public Meeting Initiated to Discuss a Course of Action that may be taken in the Lava Beds Herd Use Area (HUA).

A meeting was conducted June 18, 1980, at 10:30 AM, in the conference room at the Winnemucca District Office of the BLM. The subject of this meeting was to decide on a course of action to be taken in the Lava Beds HUA to alleviate the pressure on a heavily stressed, overpopulated wild horse/burro herd, and to serve as a rehabilitative measure to aid in the reestablishment of the vegetative communities.

The following is a list of the interested parties invited to attend the meeting:

Robert G. Irvin
President, C-Punch Corporation

Jiggs Goodwin*
Range Manager, C-Punch Corp.

Dawn Lappin*
President, WHOA

Helen Reilly
President, ISPMB

Phil Benolkin*
Wildlife Biologist, NDOW

B.G. Bunyard
Livestock Operator (in affected area)

*Attended Meeting

The following is a list of Bureau personnel that attended the meeting:

Brad Hines
Mark Gish
Dave Favre
Barbara Bruce
Paul Jancar
Rodger Bryan

Brad Hines and I explained to the group that there was a serious problem of overobligation in the Lava Beds HUA. It was explained to the group that the bureau was proposing to remove approximately 786 wild horses and 12 wild burros. This would reduce the herd to an interim management level of 90 horses and 30 burros, which would allow the range condition to improve until such time as a Management Framework Plan (MFP) decision sets the optimum herd size. Concurrent with the reduction in horse numbers, Brad indicated to the group that he would also like to get a consensus on some degree of suspension in domestic livestock use.

At this point, Brad asked the group if they had any comments or suggestions on the bureau's proposed action, and what alternative courses of action they thought the bureau might take to aid in solving the problem of overuse.

Phil Benolkin agreed that the Lava Beds range was in extremely poor condition. Mr. Benolkin stated that the area immediately around the few springs found in the range is bare and completely void of vegetation (approximately 100-200 feet in diameter). This condition affords no protective coover for birds and other species of wildlife that approach the springs for water. Mr. Benolkin feels that soil erosion is a severe problem and that both permitted and wild livestock numbers need to be reduced. He stated that livestock use during the vegetative growing season has the most serious impact on the plants, but that winter sheep use doesn't pose a severe problem, and summer sheep use would be extremely damaging.

Jiggs Goodwin then described his livestock operation in the Lava Beds. He also agreed that the range was in extremely poor condition, and because of this situation is only running approximately 50 head of cattle in this area yearlong. He said that before the large increase in wild horse numbers, he would normally run up to 300 head of cattle in the same area. Mr. Goodwin also stated that if it would result in a reduction of wild horse numbers, he would cut his present herd in half to 25 animals, but he also added that he felt he has already undergone a large enough voluntary reduction (approximately 84%).

As an alternative to removing any cattle or sheep, Mr. Benolkin was curious as to the viability of a change in the season of use (i.e., remove cattle during the growing season). Mr. Goodwin responded by stating that to remove the cattle for the growing season would in effect remove them indefinitely as he has no place to move the excess cattle without jeopardizing another area. Mr. Goodwin assured the group that he would maintain the number of cattle at 50, and would remove any excess numbers that might move into the area.

Dawn Lappin stated that the bureau's proposed action would probably cause some concern with most of the major wild horse groups in that they're afraid the reduction to the low numbers would not be an interim action. Mrs. Lappin also wanted some assurance that the livestock numbers would not be allowed to increase before the District Manager's Final Decision is made on the land use plan, and that we should state what vegetative conditions must exist before the livestock are allowed to return to the range. In the bureau's letter to solicit public comment on the proposed action, Mrs. Lappin wants us to state that one of the livestock operators has taken a voluntary 84% reduction in numbers because of the large numbers of wild horses currently utilizing the area.

In summation, it was the general consensus of all parties present that severe range damage is occurring in the Lava Beds herd use area due to the large numbers of wild horses, and that something must be done to stop the decline in range condition. The group decided on several alternative courses of action that they would like to see analyzed in the environmental assessment in addition to the proposed action:

1. Reduce the wild horse numbers to levels identified in the proposed action and don't alter the present domestic livestock use.

2. Reduce the wild horse numbers to levels identified in the proposed action and allow domestic livestock numbers to increase at the same rate as the wild horses.

3. Reduce the wild horse numbers to levels identified in the proposed action and modify the season of use for the sheep operation by having them come off one month earlier than the present license requires or change their area of use to the valley floors, or a combination of both.

Everyone agreed that studies involving forage utilization and range trend should be established in the area to monitor any changes that might occur. Mr. Benolkin stated that he would like to get involved in the selection of critical wildlife areas as sites for future studies.

If enough interest is generated by the general public after being notified of the proposed action, the group suggested that a field trip, similar to the one conducted in the Fox Range, be taken to show the public exactly what the problems are.

The meeting adjourned at 1:30 PM.

Rodger T. Bye

APPENDIX II

UNITED STATES GOVERNMENT

Memorandum

DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

IN REPLY REFER TO:
4700/1791
(N-027.8)

TO : Area Manager, Sonoma-Gerlach

Date: September 8, 1980

FROM : Rodger T. Bryan, Natural Resource Specialist

SUBJECT : Incorporation of Public Comments on EA #NV-020-0-38

The following is a list of the persons and organizations which have responded to the Bureau's letter dated July 15, 1980, soliciting comments on the management options presently available to resolve or lessen the impacts of the environmental disturbance on the Lava Beds herd use area. In addition, the list indicated how each comment was considered and incorporated into the EA.

Name	Organization	Action Taken On Response
Robert Irvin	C-Punch Corp.	Comment considered in analysis
Craig Downer	Animal Protection Institute	Comment considered in analysis
Frederic Wagner	National Academy of Science	Consideration unnecessary
Paul Bottari	Nevada Cattlemen's Assn.	Comment considered in analysis
Dennis White	American Humane Association	Comment considered in analysis
B.G. Bunyard	Rancher	Comment considered in analysis

Rodger T. Bryan

DSC-1541-2
Mar. 1974

4700/1791
(N-027.8)

705 East Fourth Street
Winnemucca, Nevada 89445

July 15, 1980

C-Punch Corporation
Jiggs Goodwin
Rt. 1, Box 65
Lovelock, NV 89419

Dear Mr. Goodwin:

The Lava Beds Herd Use Area (HUA), approximately 15-20 miles east of Gerlach, Nevada, has shown a marked increase in wild horse and burro numbers in the past eleven years, which when combined with other grazing activities has caused a deteriorating range condition and has adversely affected the ecological balance of the area.

An inventory conducted in the spring of 1969 revealed a total of 26 wild horses in the HUA. The most recent inventory, conducted in February 1980, revealed a total of 789 horses and 38 burros. After the completion of this foaling season, it is estimated that there will be 876 horses and 42 burros (based on an 11% net increase in numbers per year). These 918 animals will utilize approximately 11,016 AUMs of forage. This is in addition to the 2,106 AUMs of licensed domestic livestock use, and approximately 157 AUMs of wildlife use, which results in a total use demand in 1980 of 13,279 AUMs. Preliminary figures from the 1979 range survey indicate that the carrying capacity for the HUA is estimated to be 5,607 AUMs. This indicates that the HUA is overobligated by an estimated 7,672 AUMs, or 137%.

Because of this situation significant resource damage is occurring in the HUA; perennial grasses are being grazed close to 100 percent yearly, and sagebrush and hopsage plants are being pawed out by horses in search of the protected grasses in the shrub understories. This is causing a significant decrease in the percentage of ground cover and is contributing to increased soil erosion problems, plus increased wildlife and livestock competition for forage.

On June 18, 1980, a meeting was held in the Winnemucca District Office with one of the affected livestock operators, Wild Horse Organized Assistance, and the Nevada Department of Wildlife. The purpose of this meeting was to discuss the various management options available to the bureau to protect the soil and vegetation resources from further deterioration, and to insure the preservation of a healthy, viable, and productive wild horse/burro herd. The livestock operator, in charge of the cattle operation in the HUA, stated that for the past five years (the period of time when the horse herds started showing their most notable gains) he has voluntarily reduced his cow herd by 84%, to compensate for the lack of forage in the area. Listed below are several alternatives that the group decided should be analyzed in the forthcoming Environmental Assessment (EA) as possible management options.

Alternatives

1. Proportionate reduction of livestock and wild horses/burros to meet the carrying capacity.

2. Reduce the wild horse/burro numbers to interim management levels of 90/30 respectively and don't alter the present domestic livestock use.

3. Reduce the wild horse/burro numbers to interim management levels and allow domestic livestock numbers to increase in succeeding years at the same rate as the wild horses until the carrying capacity is reached.

4. Reduce the wild horse/burro numbers to interim management levels and modify the season of use for the sheep operation by having them come off one month earlier than the present license requires or change the area of use to the valley floors, or a combination of both.

Should a roundup be determined necessary, it would possibly begin in November or December 1980, depending on the availability of funds and manpower, and would continue until the proposed number of horses/burros are captured.

In accordance with Section 14 of the Public Rangelands Improvement Act of 1978 (Public Law 95-514), we invite your comments concerning the management options.

Upon completion of the draft EA, a copy will be available upon request.

If you require any further information please contact Brad Hines or Rodger Bryan at this office.

If you care to comment on any or all of these alternatives, please do so by August 4, 1980.

Sincerely yours,

Vaden G. Stickley

Vaden G. Stickley
Acting District Manager

American Horse Protection Association
Mrs. William Blue
1312 - 18th Street, N.W.
Washington, D.C. 20036

American Humane Association
5351 S. Roslyn
Denver, CO 80110

Humane Society of the U.S.
President
2100 L Street, N.W.
Washington, D.C. 20037

International Assn. for the Protection
of Wild Horses/Burros
Helen Reilly
11790 Deodar Lane
Reno, Nevada 89506

National Mustang Association
President
596 N. 400 W.
St. George, Utah 84770

National Wildhorse Association
P.O. Box 12188
Las Vegas, NV 89112

Wild Horse Organized Assistance
Dawn Lappin
P.O. Box 555
Reno, NV 89504

Sam Millazzo
Regional Supervisor
Nevada Dept. of Wildlife
Region 1, 380 W. B
Fallon, NV 89406

Nevada Woolgrowers
Gracian Uhalde, President
P.O. Box 88
Ely, NV 89301

Nevada Cattlemen's Association
975 Fifth Street
Elko, NV 89801

James McKevitt
Field Supervisor
U.S. Fish and Wildlife Service
Federal Building, RM E-2727
2800 Cottage Way
Sacramento, CA 95825

C-Punch Corp.
c/o Robert G. Irvin, President
1130 S. Flower Street
Los Angeles, CA 90015

Animal Protection Institute
P.O. Box 22505
Sacramento, CA 95822

Funds for Animals
Richard Negus
7126 N. 19th Ave, TH 122
Phoen ix, Arizona 85021

B.G. Bunyard
P.O. Box 184
Cedarville, CA 96014

Wild Horse and Burro Committee
for National Academy of Science
Chairman Fred Wagner
College of Natural Resources
Utah State University
Logan, Utah 84322

C-Punch Corporation
Jiggs Goodwin
Rt. 1, Box 65
Lovelock, NV 89419

Marlow Jevning
Pershing County Sportsmen's Assn.
Box 413
Lovelock, NV 89419

C - PUNCH CORPORATION

LOS ANGELES
1130 S. FLOWER ST.
LOS ANGELES, CALIF. 90015
(213) 747-5604

RENO
P. O. BOX 2976
RENO, NEVADA 89505
(702) 329-5252

July 18, 1980

Mr. Valden G. Stickley
Acting District Manager
Bureau of Land Management
705 East Fourth Street
Winnemucca, NV 89445

Re: 4700/1791 (N-027.8)

Dear Mr. Stickley:

In reply to your letter of July 15, 1980, regarding the wild horse problem in the Lava Beds, I have forwarded same to Jiggs Goodwin since he is more familiar with the problem then I. As you indicated, we have reduced our cattle herd by 80% and we are willing to cooperate in any reasonable way with the Department to facilitate the removal of the horses and rehabilitation of this very fine area.

It is my intention to be out of the country most of next month and if you require anything further in this matter, please contact Mr. Goodwin.

Sincerely,

C-PUNCH CORPORATION

Robert G. Irvin

ROBERT G. IRVIN
President

RGI:ljp

cc: Mr. Jiggs Goodwin
Route 1, Box 65
Lovelock, NV 89419

ANIMAL
PROTECTION
INSTITUTE
OF AMERICA

5894 South Land Park Drive
P.O. Box 22505
Sacramento, CA 95822
(916) 422-1921
TWX 910 367 2375 API SAC

July 22, 1980

Vaden G. Stickley
Acting District Manager
Bureau of Land Management
705 East 4th Street
Winnemucca, NV 89445

Dear Sir:

Thank you for your letter concerning the Lava Beds Herd Use Area east of Gerlach, Nevada. The way you describe it, the wild horses are overrunning the area and causing severe habitat deterioration. I would like to know, however, whether the usage you describe is confined to a single, small area or is spread out over a much vaster area. If the wild horses have increased since 1969 from 26 to 876, they must be deriving their livelihood from a substantial resource base.

Since this is an area which seems to be very conducive to the maintenance of wild horses and, to a lesser extent, burros, the Animal Protection Institute of America would suggest that the area be relegated for use by wild horses and burros and that other uses be minimized in the area. If the Bureau of Land Management continues to persecute the wild horse in all areas where found without allowing it to establish a natural balance in certain areas, then I see that the wild horse will continue to be regarded as a problem and to be pushed around until it is eventually so weakened or mal-adapted or restricted that the people will simply decide to eliminate it.

API suggests that you reduce livestock in the area and cull the wild horse and burro herds only in those areas where critical habitat damage is occurring and where livestock

Continued . . .

usage is most intense and most traditional. We would like to see you allow a natural balance between the wild horse and its environment (including all the plants upon which it depends, and all the flora and fauna which it affects) to become established. In this way, the end result will be a well-adjusted population of wild horses and burros living in an environment which has absorbed the full impact of the wild horse and adjusted this into its regime.

Of the alternatives presented, we would favor #1: Proportionate reduction of livestock and wild horses/burros to meet the carrying capacity. We hope, however, that you will consider the alternative we have proposed. This would entail a substantial compromise on the part of local ranchers, perhaps an alternative means of deriving a living in the area could be suggested and developed through a cooperative program of both BLM and local residents. I would suggest that an alternative use in many areas of Nevada would be to harvest the nutritious pinyon nut and market this as a food. Perhaps, too, a tourism industry could evolve around the wild horses.

We most strongly oppose alternative #3 which would allow domestic livestock numbers to remain the same for the present and thereafter allow them to increase until the carrying capacity is reached. We see this as a clever way of crowding the wild horse and burro out of the area.

I am planning to attend the meeting on the plan for the Sonoma Gerlach Resource Area on July 25 to give API's input on behalf of wildlife, wild horses and burros. Please provide for time for me to speak.

Also, please send a copy of the draft Environmental Assessment regarding the Lava Beds Herd Use Area when it is completed.

Thank you for keeping us informed.

Sincerely,

Craig C. Downer
Research Services

CCD:sb

P.S. If you could provide me with information on the whereabouts of the wild horse herds in your district, perhaps in the form of a map, I would be most obliged. I would like to check on the herds and the range conditions during the weekend after the meeting. Would it be possible to bring this map to the meeting?

COLLEGE OF NATURAL RESOURCES

Utah State University UMC 52

Logan, Utah 84322

OFFICE OF THE DEAN
(801) 750-2445

July 22, 1980

Mr. Vaden G. Stickley
Acting District Manager
U.S. Bureau of Land Management
705 East Fourth Street
Winnemucca, Nevada 89445

Dear Mr. Stickley:

Thank you for your letter of 15 July asking for comments on your proposed management alternatives for the Lava Beds Herd Use Area.

We have just completed a large report that has assessed the state of knowledge on wild horses and burros and proposed a research program to be supported by B.L.M. The next stage mandated for our Committee by the Public Rangelands Improvement Act of 1978 is to oversee that research. The final stage will be to integrate the results of that research with the material we have pulled together so far, and write a final report which includes management recommendations. Consequently, I don't feel that we are yet in a position to provide the comments you request.

I will say, however, that your approach of offering an array of decision alternatives appeals to me as the effective way to proceed administratively. I don't see the future function of our Committee as advocating an alternative from among such an array. The decision must be made by B.L.M., in my opinion, taking into account the several publics whom the Bureau serves. But I would hope that we will eventually be able to comment on the biological, economic, and social consequences of each alternative; and that this information would be useful in the final decision process.

Many thanks for contacting me, and I hope we have a chance to get together on horse and burro matters in the near future.

Yours sincerely,

F. H. Wagner

Frederic H. Wagner
Associate Dean and
Director, Ecology Center
Chairman, Wild and Free-Roaming
Horses and Burros Committee

cc: Michael Zagata

FHW/mjs

Nevada Cattlemen's Association
975 Fifth Street - Elko, Nevada 89801
(702) 738-6846

July 24, 1980

Mr. Vaden G. Stickley, Acting District Manager
BUREAU OF LAND MANAGEMENT
705 E. Fourth St.
Winnemucca, NV 89445

Dear Mr. Stickley:

We have reviewed the Lava Beds Herd Use Area plans and offer the following suggestions:

The wild horse population in this herd use area should properly be reduced to the 1971 levels. It is obvious that the wild horses in this area have not been managed as required by Public Law 92-195. Using a 20% annual increase rate, which would be realistic for the 1969-71 period, the 1971 population would be 38 head. This number is sufficient to allow a viable horse herd.

The statement in the first paragraph of Page 1 says that the increase in wild horses and burros, which when combined with other grazing activities has caused a deteriorating range condition. It is obvious that the excess wild horses have been the cause of range deterioration in this area. To pass even a portion of the blame to range deterioration on to other grazing activity is in effect a false accusation. A typical procedure followed by the BLM in the past was to determine the amount of forage available for grazing and then allocate those A.U.M.'s to the range users. This set a base to go by for future management. According to your figures, livestock were licensed at 2,106 A.U.M.'s. (I assume this is the same as use prior to 1969). Cattle numbers have not been increased; and, as you have noted, have even been reduced by 84% the past five years. Wild horses and burros, increasing from 26 head in 1969 to 918 head in 1980, have been putting the excessive demand on the resource. They should take the blame they deserve.

Of the alternatives offered, parts of Alternative 2 and 3 would be the fairest for the livestock operator and the broad general public (whose resource is at stake). Reduction of the

wild horse and burro numbers to 90 and 30 respectively is a generous offering considering the numbers at the passage of the Wild Horse and Burro Act. However, if these numbers would be used as an average over for example a four year gather period, it would seem a reasonable number. Domestic livestock should not be reduced any further and as more feed becomes available, it should be allocated to livestock. Wild horses and burros should not be allowed to increase over the four year average of 90 and 30 respectively.

A round-up should be arranged as soon as possible to prevent any further resource damage.

Sincerely,

NEVADA CATTLEMEN'S ASSOCIATION

Paul Bottari

Paul Bottari
Executive Secretary

PB/ls

cc Bill Hall

The American Humane Association

5351 S Roslyn Street
Englewood, Colorado 80111
303 779 1400

AMERICAN HUMANE

July 25, 1980

Mr. Vaden G. Stickley
Acting District Manager
Bureau of Land Management
705 East Fourth Street
Winnemucca, NV 89445

Re: 4700/1791 (N-027.8)

Dear Sir:

The American Humane Association would like to submit a brief comment on the Wild Horse situation at Lava Beds Herd use area.

It is our opinion that alternative number one; Proportionate reduction of livestock and wild horses/burros to meet the carrying capacity be initiated. The purpose of the Wild Horse Act was to protect and provide equal treatment for horses and burros who are in competition with other grazing animals in specific designated areas. We do not believe the entent of management should be to bring the number of animals to the approximate levels they were in 1971.

We would be most happy to receive and review the draft EA when it is completed.

Sincerely,

Dennis J. White
Director
Animal Protection

DJW:da

August 18, 1980

District Manager
U.S. Bureau of Land Management
Winnemucca, NV 89445

RE: Your File No. 4700/1791
(N-0271.8)

Dear Sir:

The writer has read your June 30, 1980, Preliminary Scoping Document for the Sonoma-Gerlach Grazing Environmental Impact Statement; your memorandum dated July 13, 1980, addressed to a group of citizens including myself which relates to a meeting held by you on June 18; and your letter to me dated July 15, all of which relate to the Lava Beds Herd Use Area (HUA). The following is my response thereto.

DOCUMENT OF JUNE 30

(1) On page 3 of the first document under alternatives is listed "No livestock grazing." The undersigned permittee who has used that winter range for years and my parents before me, naturally objects to such a proposal. The recent amendments to the federal range statutes (1976 and 1978) emphasize more than ever the multiple use concept of such federal acreage. No where therein do I find authority for a district manager to create a single use wild horse or some other type of wildlife refuge. The most he can do is recommend a wilderness status to a particular area but even then only the Congress can create such a park or refuge to which the statutes relating to that subject apply plus such additional directives as the legislative act may apply to the particular area in question. If you have a contrary opinion, I would appreciate it if you will cite chapter and verse.

(2) On page 4 of the June 30 document under paragraph 3 you make mention of "Maximum livestock use." The first duty would appear to be to bring the productivity of the area up to its peak. This would require that the number of wild horses and burros be decreased to the carrying capacity of a fair number when measured against the other authorized uses of the area. There need to be no talk of increasing grazing permits until the house has first been placed in order by doing everything feasible to restore the productivity of the range coupled with the maximum development of the water supply.

(3) Next, you move on to "Maximizing Wild Horses and Burros xxxxx." Those critters have no predators to prey upon them. Their numbers were controlled when they were in private ownership. They must also be controlled by man in public ownership. The foundation stone of our society is the production of wealth through the application of labor and capital to our natural resources of which the forage on the federal range is one example of the latter. The population of our nation continues to increase. God continues to make kids but he has quit making land. We had better be just to ourselves and keep our foundation stones in place and shiny before being carried away with a sentimental attachment that scorns our priorities and endangers our national supply of food and fiber.

DOCUMENT DATED JULY 13, 1980

(1) This is a memo of proposed actions to be taken in the Lava Beds HUA Area. You state: "To alleviate pressure on a heavily stressed, overpopulated wild horse burro herd, and to serve as a habilitative measure to aid in the re-establishment of the egetative communities." A good objective depending upon how you intend to achieve it.

(2) At the top of page 2 you propose to reduce the current estimated wild horse population on the area by removing about 786 horses and 12 burros, and thus bring their numbers down to around 90 and 30 respectively. It is obvious that their numbers (they are out there the year around) now exceeds their food supply. Therefore, they should be reduced in number. Nothing is sacred when the protection of the range is concerned. They are not to be grouped along with the sacred cows of India.

(3) The memo goes on to relate if that those numbers were so reduced that that "Would allow the range conditions to improve until such time as a management framework plan (MFP) decision sets the optimum herd size."

(4) The reduction of wild horse and burro numbers is steadily going forward in the other grazing districts of the Pacific Northwest. A year ago when federal funds for that purpose were delayed, the permittees in the Susanville District to the west in which the writer also runs livestock advanced a substantial sum to the district manager for that purpose, an advance that was eventually repaid. The overall cost to the federal treasury of managing the numbers of wild horses

and burros pursuant to the so-called Wild Horse and Burro Act, as amended, is now running around $2,000 per critter removed. Economic suicide via the destruction of the range must be avoided regardless of the cost if the body politic wants to assume dominion and control over what used to be a local unfunded problem.

(5) This document goes on to state that your agency would like to have a consensus on some degree of suspension in domestic limited use in the area. A judgment would first have to be made that is based upon all of the factors involved. For example, the writer has a winter use sheep permit in that area. There is no interference with the forage cover during the grazing season. I reach the area last and my sheep survive on what others have left plus their daily sharing with the admittedly too numerous wild horses and burros. It seems to me that the procedure should be to first reduce wild horse and burro numbers; next, make a judgment as to what measures can be taken to restore the range to its highest productivity and then fit the livestock pieces into that pattern. Once your agency decides to improve a range the writer has no quarrel with the revegetative methods that are usually employed.

(6) On page 2, a Mr. Phil Benolkin is quoted as saying that winter ɹep use, such as mine, doesn't pose a severe problem, but summer ɹep use would be extremely damaging. There is no summer use of sheep in the area. My sheep graze in the Susanville District at that time of year and I would not want it to be otherwise. There is no other place for them to go during the winter months.

(7) The writer was not able to attend the June 18 meeting to which this Memorandum relates. I see no need to recap the remarks of those citizens who did and who expressed themselves.

(8) Turning to page 3 of said Memo, I have the following comments to make concerning the proposed conclusions recided "In summation:"

Even a wild horse lover should subscribe to your No. 1 suggestion to reduce their number to fit their food supply. The domestic livestock use should not be reduced below present permitted numbers until all concerned can inspect and make a common judgment. Up north in Oregon, it has been the custom for years for the Oregon Fish & Wildlife Commission to cooperate with the ranchers and federal agencies in range rehabilitation projects such as reseeding, water development, etcetera. It is the hope of we ranchers who range in the Susanville and Winnemucca districts that similar help can be obtained from our state wildlife agencies.

The Oregon license buyers reason that they ought to put something into the pot if they expect to take something out. No one can quarrel with that kind of logic.

(9) Turning to your proposed alternative No. 2, this proposal could be improved, in my opinion, by chopping off the last clause which relates to the increasing of permitted livestock numbers. After the wild horse-burro population has been reduced and range improvement programs have had their chance, then would be the time to re-examine the size of the existing permits.

(10) Next, is your third and last proposed alternative. My family has been engaged in the sheep business out in that area for about 100 years. We learned by the trial and error method long before the coming of the Taylor Grazing Act in 1934. Nothing has happened in that region since 1934 that has caused the federal administrators to say we have been doing it the wrong way over the years. Our permitted numbers are based upon experience. If there was a better place to graze our sheep during the winter months, we would have been ing it during the priority period of 1929-34.

In conclusion, I wish to say that the writer is willing to cooperate in any field trip those who live farther away may care to engage in. All of we ranchers in the Susanville district to the West are currently engaged in cooperation with all interested groups of society to the maximum degree. They recently investigated and made a judgment and a recommendation on my area of permitted use in that district, a recommendation that I appreciated. The facts should hurt no one.

DOCUMENT DATED JULY 13, 1980

This document is a letter addressed to me by the district manager. You begin by making an accurate assessment of the excess wild horse and burro population. In view of the control measures that have been in effect, the past several years in most of the other grazing districts throughout northern California and Oregon, I naturally wonder why these critters have been permitted by the federal government to increase to where they have created a range problem that now threatens to engulf me and those dependent upon me as well as those who champion the other multiple use activities that go on out in that area throughout the year. I have been informed that range improvement funds were reduced generally throughout the West this current fiscal year because the Congress wanted to increase the sum appropriated for wild horse control in Nevada, and did so. I say on with the job!

I am sorry that these comments did not reach you sooner but we had a better than average hay crop in Surprise Valley this Summer and I have taken advantage of it. Please keep me advised. I will attend the next meeting that you may call.

Yours truly,

B G Bunyard

B. G. Bunyard

8100
(N-027.7)

705 East Fourth Street
Winnemucca, Nevada 89445

July 16, 1980

Mimi Rodden
State Historic Preservation Officer
Nevada Division of Historic Preservation
and Archeology
Nye Building
Carson City, NV 89701

Dear Ms. Rodden:

Due to the overgrazing of available range, we are proposing to remove 786 wild horses and 12 burros from the Lava Beds Herd Use Area.

Horse traps are to be constructed where there are no recorded cultural resources sites and prior to construction, there will be an archeological clearance to determine the existence of and to prevent damage to any cultural resources as yet unrecorded.

This area does include National Register values such as the Applegate-Lassen Trail.

We believe this action will have no effect on National Register values and, reducing the number of horses should minimize potential for damage to open surface sites also. In accordance with 36 CFR 800, we invite your comment.

Sincerely yours,

Robert J. Neary
Acting District Manager

cm

THE NEVADA DIVISION OF HISTORIC PRESERVATION AND ARCHEOLOGY
201 South Fall Street — Nye Building — Room 113 — Carson City, Nevada 89710
MIMI RODDEN, Administrator
Telephone (702) 885-5138

DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES
ROLAND D. WESTERGARD, Director

ROBERT LIST
GOVERNOR

File #520.040

August 4, 1980

Mr. Robert J. Neary
Acting District Manager
Bureau of Land Management
705 East Fourth Street
Winnemucca, NV 89445

Dear Mr. Neary:

This office has received your letter of July 16, 1980 requesting our comment on the proposed removal of wild horses and burros from the Lava Beds Herd Use Area. As indicated in your letter, properties listed on and eligible to the National Register of Historic Places are located in the Herd Use Area.

After careful review of your letter and the procedural recommendations contained therein, it is my determination that the proposed undertaking will have "no effect" on resources of National Register quality. If the recommendations cannot, in part or whole, be followed then a new determination of effect must be negotiated.

A copy of this letter should be retained in the project file to document consultation with the State Historic Preservation Officer as required by 36 CFR, Part 800.4.

Sincerely,

MIMI RODDEN, Administrator
(State Historic Preservation Officer)

Charles D. Zeier

By: Charles D. Zeier, Alternate
State Historic Preservation Officer

CDZ:vh

4700
(N-022)

705 East Fourth Street
Winnemucca, Nevada 89445

September 9, 1980

Robert Hill
Governor's Office of
Planning Coordination
Capitol Complex Bldg. 2nd Floor
Carson City, Nevada 89710

Dear Mr. Hill:

Enclosed for State Clearinghouse review and comment is an environmental assessment and gathering plan for the roundup of 786 wild horses and 12 wild burros in the Lava Beds area of Pershing County northwest of Lovelock.

The action proposed is as follows:

1. Remove approximately 786 wild horses and 12 wild burros, which would reduce the herd to interim management levels of 90 and 30 head respectively.

2. The cattle operator will be required to maintain his herd at 50 animals, which will require periodic monitoring to remove excess numbers that stray into the area which is unfenced.

3. The sheep operator will be required to remove his animals at the end of February each year, and the area of use will changed to include more of the valley floors. This will involve the suspension of approximately 333 AUMs.

4. An additional 10 wild horses and 5 wild burros will be captured, marked (i.e., wide colored canvas neck collars, electronic collars, ear tags, etc.), and rereleased for study purposes.

Please submit the clearinghouse comments to this district by October 17, 1980.

Sincerely yours,

Vaden G. Stickley
Acting District Manager

Enclosure

STATE OF NEVADA
GOVERNOR'S OFFICE OF PLANNING COORDINATION
CAPITOL COMPLEX
CARSON CITY, NEVADA 89710
(702) 885-4865

October 17, 1980

Mr. Vaden G. Stickley
United States Dept. of the Interior
Bureau of Land Management
705 East Fourth Street
Winnemucca, NV. 89445

RE: SAI NV #81200017 Project: Lava Beds Horse & Burro Gathering

Dear Mr. Stickley:

Attached are the comments from the following affected State Agencies: Department of Wildlife concerning the above referenced project.

These comments constitute the State Clearinghouse review of this proposal. Please address these comments in the final or summary report.

Sincerely,

Mike Nolan for
Robert M. Hill
State Planning Coordinator

RMH:sl
Enclosures

ROBERT LIST
GOVERNOR

JOSEPH C. GREENLEY
DIRECTOR

1100 VALLEY ROAD P.O. BOX 10678 RENO, NEVADA 89520 TELEPHONE (702) 784-6214

October 10, 1980

Mr. Mike Nolan
State Clearinghouse
Office of the State Planning Coordinator
Capitol Building
Carson City, Nevada 89710

Dear Mike:

The Nevada Department of Wildlife appreciates the opportunity to review and provide comments on the Environmental Assessment for Lava Beds Wild Horse/ Burro Gathering, SAI #81200017.

The Department of Wildlife concurs with the proposed action delineated in the Environmental Assessment. It is the Department's position that none of the 6 listed alternatives to the proposed action would achieve the desired results.

Overgrazing by both permitted and wild livestock has caused a severe erosion problem concurrent with extreme deterioration of the flora of the range. The proposed drastic action is needed to relieve the severely depleted range conditions that now exist and to hopefully reverse the present trend in the direction of restoration.

It is also the recommendation of this Department that browse species be included in any study transects that are established. Since vegetation has been eliminated or severely depleted around the few springs in the area, several transects should be included in these critically important wildlife areas to record any changes that occur. Restoration of vegetation around the springs is sorely needed to afford protective cover for birds and other species of wildlife that approach the springs for water.

If you have any questions regarding these concerns, please contact this office at your earliest convenience.

Sincerely,

Joseph C. Greenley
Director

VKJ/ba

cc: Region I

ANIMAL
PROTECTION
INSTITUTE
OF AMERICA

5894 South Land Park Drive
P.O. Box 22505
Sacramento, CA 95822
(916) 422-1921
TWX 910 367 2375 API SAC

November 4, 1980

Vaden G. Stickley
Acting District Manager
Bureau of Land Management
705 East 4th Street
Winnemucca, NV 89445

Dear Sir:

The Animal Protection Institute of America received your draft Environmental Assessment and we are very displeased to learn of your proposed action to cut the wild horse herd by 786, leaving 90; and the burro herd by 12, leaving 30. We feel that this action represents a clear discrimination against the wild horse public interest, and that range improvements could have been realized with a reduction of one-third this number.

API is curious about the underlying motives for and end results of this proposed action. We detect here a sort of magnifying glass aspect. We feel there is a lack of perspective and a failure to disclose all the elements at work. For example, perhaps the wild horses are highly concentrated in the Lava Beds Herd Use Area because they have been harassed and driven from adjacent areas. I have seen this happen in other areas of the state, such as Tonopah, and wonder if the same harassment is involved in the Gerlach area. Perhaps, then, the solution to the problem is to exert a better program of wild horse and burro protection in the HUA and in adjacent HUA's.

What API fears is that the proposed plan is like using a magnifying glass and giving a distorted picture of the wild horse and burro and its effect on the range. We fear this would be a gross injustice to the wild

Continued . . .

horse and burro, and the public which supports the wild horse and burro. Further, we are concerned that there may be a lack of perspective as to the overall value of the wild horse in America. There is a failure to recognize the importance of Nevada to the continued presence of the wild horse in the United States inasmuch as Nevada is its most important stronghold. This unwillingness to accommodate healthy wild horse numbers in Nevada is an unreasonable compromise to local-vested livestock interests. It is, we believe, a betrayal of the public trust.

API feels that the nearly complete reduction of wild horses would greatly set back the natural adaptive process which the wild horse population is undergoing in this desert area. We believe that this wholesale reduction would countermand or erase the product of many generations of valuable ecological adaptation in the wild horse population and so severely restrict the genetic variety as to imperil the overall health of this population.

API notes that the livestock interests in the area are minimal. There are only two operations which utilize a total of 1980 AUM's active preference. It appears that the public interest in this sizable wild horse population is being overlooked. The proposed plan caters to two livestock operators at the expense of the general public of the U.S. and the wild horses themselves.

In describing Alternative I, the no action alternative, you note that the populations of horses/burros would fluctuate at a natural rate dependent upon reproduction potential, mortality rates, disease, and the limited range resource. These natural controls are all valid and, in fact, lead to a better adapted population of wild horses or burros, because they allow natural selection <u>to act</u>.

API favors Alternative IV: Total removal of domestic livestock without reduction in wild horses/burros, as we feel this would best represent the public interest in an area which is obviously very important to the continued survival and wild existence of the equines. But we would allow for some reduction --up to one-third present population--in order to improve range conditions.

Under Social Aspects, API appreciates your recognition of the "vicarious value" of the wild horse. This is a very important value to consider for it has much to do with the quality of life and mental and spiritual well being of us all. It is too often overlooked, but is just as important as more practical considerations. In other

Continued . . .

words, we have to ask ourselves what quality of life we are perpetrating on the Earth. The wild horse is very important as a symbol of freedom, as a noble animal which has served man and which man now allows to live, in a few of the most remote and desolate places, according to its natural instincts and abilities. Not only is the wild horse population beautiful and capable of adapting in a harmonious way to the desert environment, given time, but the wild horse is a critical test of man's moral ability or collective conscience.

Some further points we would like to make are:

1: There is little dietary overlap between mule deer and wild horses, the least occurring during the critical periods of the year, when bitter brush and white sage are eaten by deer, but usually left alone by horses.

2: The care made for wild horses destroying the resource fails to consider the full implications of the science of ecology and the concept of evolution. The wild horse has been pre-adapted for its life in North America. It is filling a vacant niche. It has been absent only a few to several thousand years, and the amount of co-evolution which took place between the plants and animals of former times has not been entirely erased. Over the generations the native plant and animal communities will increasingly co-evolve in response to the grazing pressure of wild horses. The end result will be a well-balanced ecosystem with a greater diversity of grazers. The wild horse enhances the ecosystem. It is not inherently destructive, but the natural world must be allowed to co-adapt to its presence. Allowing natural mortality to take place would result in a better co-evolved community.

3: API would not object to the natural attrition of wild horse numbers which would result from starvation, disease or winter kill, for this is <u>nature's way</u>; and through a selection of the fittest such attrition helps to adapt the wild horse population to the region in which it lives and to balance its impact therein.

4: Alternative II: Proportionate reduction of domestic livestock and wild horses/burros to meet the carrying capacity. API feels that this alternative is much more equitable than the one being proposed and recommended. However, we still feel that the number 529 is too large a reduction and would set back the adaptive process already discussed.

Continued . . .

5: Under 3: Adverse Impacts That Cannot Be Avoided, API believes that the Loss of Freedom that would result to the horses themselves is a very serious price to be paid; this adverse impact should be included.

Thank you for considering our views and please inform us of any final decisions and wild horse/burro gatherings.

Most sincerely,

Craig C. Downer
Research Services

CCD:sb

cc: Ed Spang
Milton Fry
Dawn Lappin
John Boyles