



BUFFALO HILLS Winnemucca
Dist
United States Department of the Interior

BUREAU OF LAND MANAGEMENT
WINNEMUCCA DISTRICT OFFICE
705 EAST 4TH STREET
WINNEMUCCA, NEVADA 89445



6-16-89
IN REPLY REFER TO:
4700
(NV-023.4)

June 16, 1989

Commission for the Preservation
of Wild Horses and Burros
Stewart Facility
Capitol Complex
Carson City, NV 89701

Dear Ms. Terri Jay:

Enclosed is a draft wild horses and burro removal plan for your review and comments.

We would appreciate receiving your comments no later than July 20.

Sincerely yours,

District Manager

Enclosure

DRAFT

U.S. DEPARTMENT OF THE INTERIOR

BUREAU OF LAND MANAGEMENT

Winnemucca District Office

Sonoma-Gerlach and Paradise-Denio Resource Areas

WILD HORSE/BURRO MANAGEMENT

WILD HORSE REMOVAL AND BURRO (GATHERING) PLAN
FOR SEVEN HERD MANAGEMENT AREAS

DRAFT

I. Introduction

The intent of this proposed removal (gathering) plan is to outline the methods and procedures to be used in removing approximately 1,779 excess wild horses and 17 burros from seven Herd Management Areas (HMAs). The proposed action would result in the attainment of Appropriate Management Levels (AMLs) for six of the seven HMAs. The proposed removal would not result in attainment of AML's for the Granite Range HMA.

The excess animals would be removed from the Shawave Range, Calico Mountains, Granite Range, Buffalo Hills, Little Owyhee Deser, Snowstorm Mountains, and Nightingale HMA's. Refer to the attached maps for specific locations and to II. C. for additional specifics.

The proposed removal operation would begin about October 1, 1989 and be completed by January 24, 1990.

II. General Area Description-Background Data

A. Location and Land Status

The Calico Mountains, Granite Range, and Buffalo Hills HMA's are within close proximity to each other, and are located near the town of Gerlach Nevada. The Nightingale and Shawave Mtns. HMA's are adjacent to each other, and are located about 30 miles south of Gerlach. The Little Owyhee Desert and Snowstorm Mtns. HMA's are also adjacent to each other, and are located about 40 air miles northeast of Winnemucca Nevada.

<u>HMA Name</u>	<u>Land Status</u>			<u>Percent of Public Land</u>
	<u>Public Land</u>	<u>Private Land</u>	<u>Total</u>	
Granite Range	88 506	13,144	101,650	87
Buffalo Hills	123,141	9,269	132,410	93
Little Owyhee Desert	398,160	16,560	414,720	96
Snowstorm Mtns.	133,138	12,400	145,538	91
Nightingale Mtns.	72,218	3,801	76,019	95
Shawave Mtns.	99,917	18,214	118,141	85
Calico Mtns.	80,500	100	80,600	99

B. Reference to Land Use Plans (LUPs)

The LUP for the Sonoma-Gerlach and Paradise-Denio Resource Areas (RAs) were approved on July 9, 1982. The LUP (Management Framework Plan-Step III) decision was to manage for wild horses and burros in those HMAs where they existed prior to 1971, and to remove all wild horses and burros from the checkerboard Herd Area (HAs).

The proposed removal of excess animals would occur in non-checkerboard HMAs.

C. Population and Removal Data

The proposed removals of excess wild horses and burros would occur in the following HMAs, and in the priority as listed in descending order.

HMA Name	1989 Estimated Population Horses/Burros	Appropriate Management Level (AML) Horses/Burros	Proposed Number to be Removed Horses/Burros
Granite Range	625/0 <u>1/</u>	176/0	373/0
Buffalo Hills	715/0 <u>2/</u>	399/0	316/0
Little Owyhee Des	531/0 <u>3/</u>	200/0	331/0
Snowstorm Mtns.	152/0 <u>3/</u>	50/0	102/0
Nightingale Mtns.	306/0 <u>4/</u>	87/0	219/0
Shawave Mtns.	308/17 <u>4/</u>	100/0	208/17
Calico Mtns.	744/0 <u>1/</u>	514/0	156/0
TOTALS	3,381/17	1,526/0	1,779/17

- 1/ Based upon an aerial census conducted by a B-1 helicopter in September of 1988.
- 2/ Based upon an aerial census conducted by a B-1 helicopter in July of 1988.
- 3/ Based upon an aerial census conducted by a B-1 helicopter in September of 1986.
- 4/ Based upon an aerial census conducted by a B-1 helicopter in April of 1989.

With the exception of the Nightingale and Shawave Mtns. HMA's, a preremoval census will be conducted for all HMA's in July of 1989. A bell B-1 Saloy Conversion will be used for the census.

III. Justification

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)."

A land use plan was completed for the Sonoma-Gerlach and Paradise-Denio Resource Areas in 1982. A major portion of this plan was the preparation and publication of a Grazing Environmental Impact Statement which analyzed five different alternatives to manage public lands: (1) distribute available vegetation to livestock, wildlife, and wild horses/burros; (2) no action; (3) no livestock grazing, (4) maximize livestock; and (5) maximize wild horses/burros. The final analysis culminated with the issuance of the Winnemucca District Manager's Framework Plan (MFP) Step III Decisions on June 30, 1982. The decision received the State Director's concurrence on July 9, 1982. The MFP III (LUP) WH/B decision number 1.1 provides for the retention and management of wild horses/burros on non-checkerboard lands in the resource area. The decision stated that existing/current numbers (as of July 1, 1982) would be used as a starting point for monitoring purposes except where one of the following conditions exist:

1. Numbers are established by adequate and supportable resource data.
2. Numbers are established through the CRMP process as documented in CRMP recommendations and agreed to by the District Manager.
3. Numbers are established by formal signed agreement between affected interests.
4. Numbers are established through previously developed interim capture/ management plans. Plans are still supportable by parties consulted in the original plan. EAs (EARs) were prepared and are still valid.
5. Numbers are established by court order.

AML's were established for the Little Owyhee Desert and Snowstorm Mtns. HMA's by a CRMP plan approved on July 13, 1987. The AML's for the Nightingale and Shawave HMA's were established by a CRMP plan approved on September 25, 1986. The AML's for the Calico Mtns., Buffalo Hills and Granite Range HMA's were established using population numbers as existed on July 1, 1982.

IV. Removal Plan and Methods

The excess wild horses and burros will be removed (gathered) by the use of a helicopter.

Prior to the pre-work conference, BLM personnel will inspect the condition of the animals; locate and record the major concentration of animals; note the condition of all roads; presence of fences and other hazardous barriers; location of water sources; record prevailing temperature and soil conditions; drought conditions; and make note of the parent material. An evaluation of these conditions will then determine whether to proceed with the removal, delay the removal, or to proceed with the removal but with modifications (such as relocating trap sites, upgrading road conditions, etc.).

If a decision is made to proceed with the removal, a veterinarian will be present at the trap site the very first day of gather operations to check the condition of the animals. Experience gained from past removals from the Calico and Buffalo Hills HMA's indicate the proposed action may cause undue stress to the animals. It is difficult to remove animals from these HMAs without some concern for the welfare of the animals due to the following reasons:

1. The parent material is composed almost exclusively of flood basalts. This volcanic material is very sharp, and as a result, there is concern that some animals hoofs and fetlocks may become injured - especially the younger animals.

2. The presence of thick stands of juniper allows some animals to seek cover during removal operations. As a consequence, these animals may have to travel further before they are captured because of repeated attempts to remove them.
3. There are steep and extensive escarpments in the Granite Range, Calico Range, and Buffalo Hills HMA's. These geological features limit areas where animals can be brought into the temporary trap.
4. Except for the Granite Range HMA, there are Wilderness Study Areas (WSAs) in all of the HMAs. A WSA designation restricts the choices for suitable trap sites constrains removal operations. Refer to IV.A.15.

If the decision is made to proceed with the removal, a pre-work conference will be conducted at the Winnemucca District Office. During the pre-work conference, BLM personnel will give the contractor a topographic map of the removal area that shows desirable trap locations, and existing fences. The contractor will also be apprised of all of the above conditions, and how these conditions could affect the health and welfare of the animals.

Other agenda items of the pre-work conference will be contract specifications, responsibilities of BLM/contractor, helicopter operations, lines of authority, communications, contract procedures, and most of all, the health and welfare of the animals will be the main topic of discussion.

Before the Notice-to-Proceed is issued to the contractor, an assessment of the contractor's ability to perform will be made, and all of the equipment will be inspected.

A. Trapping and Care of Animals

1. The excess animals will be directed toward temporary capture corrals by means of a helicopter. Wings (from 1/8 to 1/4 mile) will be constructed leading into the corral. When the animals have been driven to within 1/4 to 1/2 mile of the trap, riders on horseback may then flank the animals and guide them into the trap. Once the animals are in the trap the gate will be closed by hand. Should an animal break back at the trap, it may be roped, if possible, by the riders. Roping will be done only when necessary, with prior approval by the Contracting Officers Representative (COR). Under no circumstances shall animals be tied down more than one hour.

It is expected that the number of animals that are driven into the traps will vary from one to 35 horses at a time.

2. It is estimated that a minimum of 17 temporary trap and corral sites (see map) will be required to remove the 1,796 excess animals. Additional temporary trap sites may be necessary if the animals disperse from their home ranges once removal operations start. The removal operations will start in the Granite Range, then move to the Buffalo Hills, then to the Little Owhyee Desert, then to the Snowstorm Mountains, then to the Nightingale and Shawave Mtns., and finally to the Calico Mtns.. Refer to attached maps for specifics. All general temporary trap locations will be selected by the COR.
3. All specific trap sittings and holding facilities must be approved by the COR prior to construction. The contractor may also be required to change or move trap locations as determined by the COR. All traps and holding facilities not located on public land must have prior written approval of the landowner.
4. All traps, wings, and holding facilities shall be constructed, maintained, and operated to handle the animals in a safe and humane manner. Traps and holding facilities shall be constructed of portable panels, the top of which shall not be less than 72 inches high, and the bottom rail of which shall not be more than 12 inches from ground level. All traps and holding facilities shall be oval or round in design. All loading chute sides shall be fully covered with plywood or like material. The loading chute shall also be a minimum of six feet high. All runways shall be a minimum of 20 feet long and a minimum of six feet high and shall be covered with plywood or like material a minimum of one foot to five feet above ground level. Wings shall not be constructed out of barbed wire or other materials injurious to animals and must be approved by the COR. All crowding pens including the gates leading to the runways shall be covered with a material which prevents the animals from seeing out (plywood, burlap, etc.) and shall be covered a minimum of one foot to five feet above ground level. Floors of vehicles used for transporting the animals and the loading chute shall be covered and maintained with a non-skid surface such as sand, mineral soil or wood shavings to prevent injuries.
5. The contract helicopter shall be used in such a manner that bands or herds will remain together as much as possible, and foals do not become separated from their mothers.
6. The project helicopter actions may occasionally be observed by a Government-controlled helicopter. All actions of the Government helicopter will be coordinated with the contractor to prevent interference with the project helicopter and contract operations.

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

7. The rate of movement and distance the animals travel shall not exceed limitations set by the COR who will consider terrain, physical barriers, weather, condition of the animals, and other factors.
8. When excessive dust conditions occur within or adjacent to the trap or holding facility, the contractor shall be required to wet down the ground with water at such location as directed by the COR.
9. Alternate pens, within the holding facility, shall be furnished by the contractor to separate mares with small foals, sick and injured animals, and estray animals from the other horses. Where required by the COR, animals shall be sorted as to age, number, size, temperament, sex, and condition, when in the holding facility so as to minimize, to the extent possible, injury due to fighting and trampling.
10. Animals shall be transported to final destination from temporary holding facilities within 24 hours after capture unless prior approval is granted by the COR for unusual circumstances. Animals shall not be held in traps and/or temporary holding facilities on days when there is no work being conducted except as specified by the COR.
11. Animals held for 10 hours or more in the traps and/or holding facilities shall be provided fresh clean water by the contractor, in an amount of a minimum of 10 gallons per animal per day. Animals held for 10 hours or more in the traps or holding facilities shall be provided good quality hay at the rate of not less than two pounds of hay per 100 pounds of estimated body weight per day.
12. It is the responsibility of the contractor to provide security to prevent loss, injury, or death of captured animals until delivery to final destination.
13. The contractor shall restrain sick or injured animals so that they may be provided treatment by the COR. The COR will determine if injured or sick animals must be destroyed and provide for destruction of such animals. If the COR cannot determine the severity of the injury or illness, a veterinarian will be consulted before the animal is destroyed. The contractor shall dispose of the carcasses as directed by the COR.

14. Branded or privately-owned animals whose owners are known will be impounded by BLM, and if not redeemed by payment of trespass and capture fees, will be sold at public auction. If owners are not known, the private animals will be turned over to the State for processing under Nevada estray laws.
15. All temporary trap sites located within the WSA boundaries will be placed on existing roads and ways, not to exceed 50' either side of the access route. Cross-country travel would be allowed so long as it does not cause impacts inconsistent with the requirements of the non-impairment criteria outlined in the IMP. Refer to maps labeled for a delineation of the WSA boundaries.
16. The on site Project Inspector (PI) and Contracting Officer Representative (COR) will have clear lines of authority and responsibilities, and will have the ability to communicate on a moment's notice with management, and the Contracting Officer. This provision is intended to assure that any contractual problems which may affect the animals or their habitat can be resolved with minimal delay.
17. The District Manager will be responsible for establishing communication procedures which provide a clear course of action to prevent contracting problems when situations which are beyond the PI's and COR's authority occur, particularly when such problems involved the safety and welfare of the wild horses.

B. Helicopter, Pilot, and Communications

1. The contractor must operate in compliance with Federal Aviation Regulations, Part 91. Pilots provided by the contractor shall comply with the Contractors Federal Aviation Certificates, applicable regulations of the State of Nevada, and shall follow what are recognized as safe flying practices.
2. When refueling, the helicopter shall remain a distance of at least a 1,000 feet or more from animals, vehicles (other than fuel truck), and personnel not involved in refueling.
3. The COR shall have the means to communicate with the pilot and be able to direct the use of the gather helicopter at all times.
4. The proper operation, service, and maintenance of all contractor furnished helicopters is the responsibility of the contractor. The BLM reserves the right to remove from service pilots and helicopters which, in the opinion of the contracting officer or COR, violate contract rules, are unsafe, or otherwise unsatisfactory. All such replacements must be approved in advance of operation by the contracting officer or his/her representatives.

C. Motorized Equipment

1. All motorized equipment employed in the transportation of captured animals shall be in compliance with appropriate State and Federal laws and regulations applicable to the humane transportation of animals.
2. Vehicles shall be in good repair, of adequate rated capacity, and operated so as to insure that captured animals are transported without undue risk, injury, or delay.
3. Only stocktrailers shall be allowed for transporting animals from traps to temporary holding facilities. Only Bobtail trucks, stocktrailers, or single deck trucks shall be used to haul animals from temporary holding facilities to final destination. Sides or stockracks of transporting vehicles shall be a minimum height of six feet six inches from vehicle floor. Single deck trucks with trailers 40 feet or longer shall have two partition gates to separate animals. Trailers less than 40 feet shall have at least one partition gate to separate the animals. The use of double deck trailers is unacceptable and shall not be allowed.
4. All vehicles used to transport animals to final destination shall be equipped with doors at the rear end of the vehicle. At least one of these rear doors shall be capable of sliding either horizontally or vertically.
5. Floors of vehicles shall be covered and maintained with a nonskid surface such as sand, mineral soil, or wood shavings, to prevent the animals from slipping.
6. The number of animals to be loaded and transported in any vehicle shall be as directed by the COR and may include limitations on numbers according to age, size, sex, temperament, and animal condition.
7. The COR shall consider the condition of the animals, weather conditions, type of vehicles, distance to be transported, or other factors when planning for the movement of captured animals. The COR shall provide for any brand and/or inspection services required for the captured animals.
8. If the COR determines that dust conditions are such that the animals could be endangered during transportation, the contractor will be instructed to adjust speed. The maximum distance over which animals may have to be transported on dirt road is approximately 60 miles per load.

VI. Signatures

Lead responsibility:

Richard D. Wheeler, Wild Horse and Burro
Specialist

Date

Gerald L. Moritz, Environmental Coordinator

Date

Scott Billing, Area Manager
Paradise-Denio Resource Area

Date

Gerald P. Brandvold, Area Manager
Sonoma-Gerlach Resource Area

Date

Submitted to State Director by:

Ron Wenker
District Manager, Winnemucca

Date

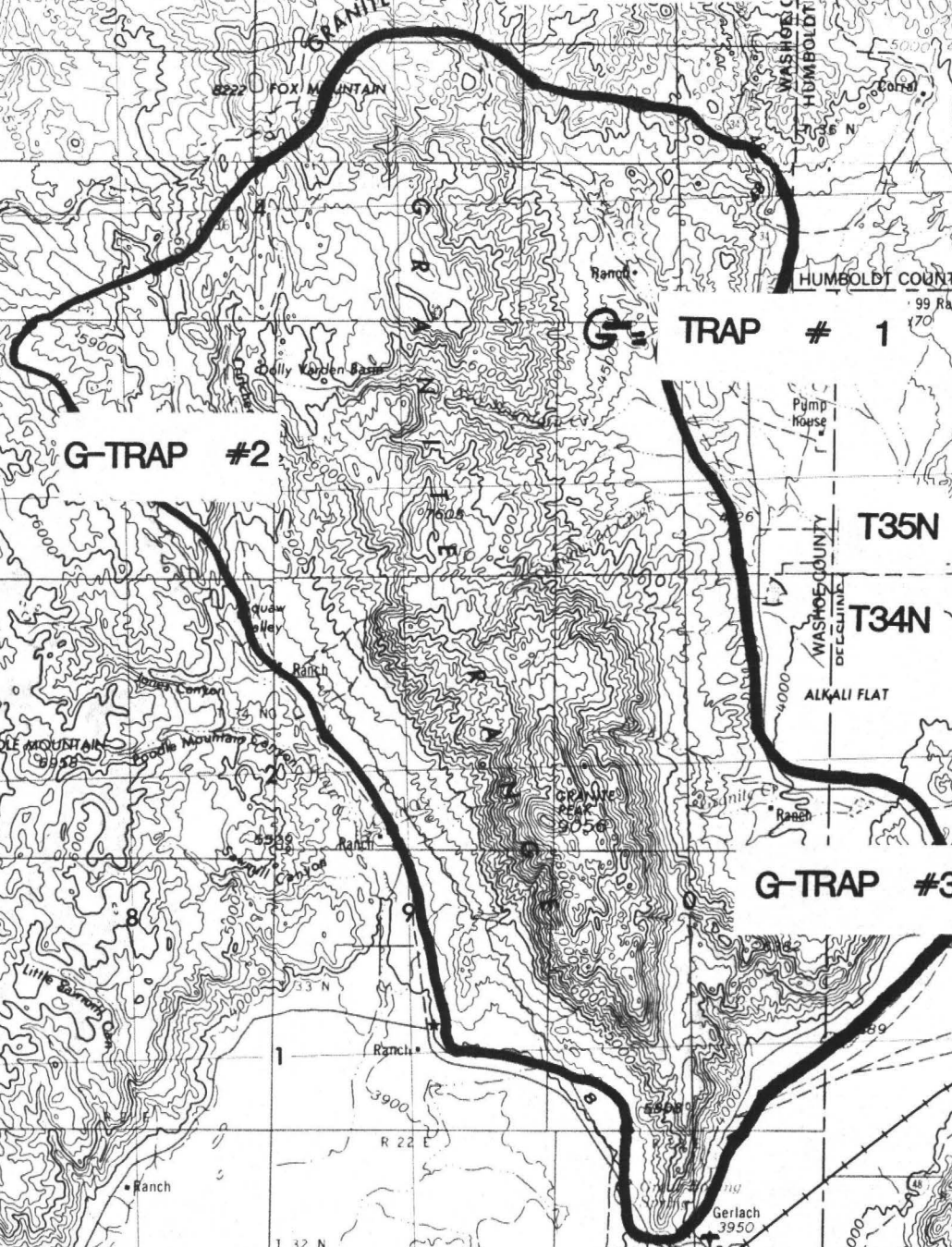
Approved by:

Edward F. Spang
State Director, Nevada

Date

GRANITE RANGE REMOVAL AREA

PRIORITY #1



G-TRAP #2

G-TRAP #1

G-TRAP #3

R22E

R23E

T35N

T34N

R 22 E

T 32 N

KR LR

GRANITE RANGE

GRANITE RANGE

WASHOE
HUMBOLDT CO

HUMBOLDT COUNTY

WASHOE COUNTY
DELEUNE

ALKALI FLAT

SAND
DUNKS

MUD
BL

CALICO MOUNTAINS

6128

6269

6488

6976

4802

99 Ranch
170

POOLE MOUNTAIN
8958

GRANITE PEAK
9056

6608

Gerlach
3950

3823

344

4662

69073

abin

Ranch

Control

Cabin

Ranch #6

HOG RANCH MOUNTAIN
772

DIVISION PEAK

DONNELLY PEAK
8491

Windmill

Bolly Valley Basin

Pump
House

Quay
Valley

POOLE MOUNTAIN
8958

POOLE MOUNTAIN
8958

in Canyon

Stackable Canyon

Wings Canyon

Little Bear

Ranch

Ranch

Ranch

Phil Siding

Gerlach

Ranch

DUCK FLAT

BUFFALO HILLS REMOVAL AREA

PRIORITY #2

G-#4

G-TRAP#5

G-TRAP#7

G-TRAP#6

T33N

T32N

T 32 N

R20E

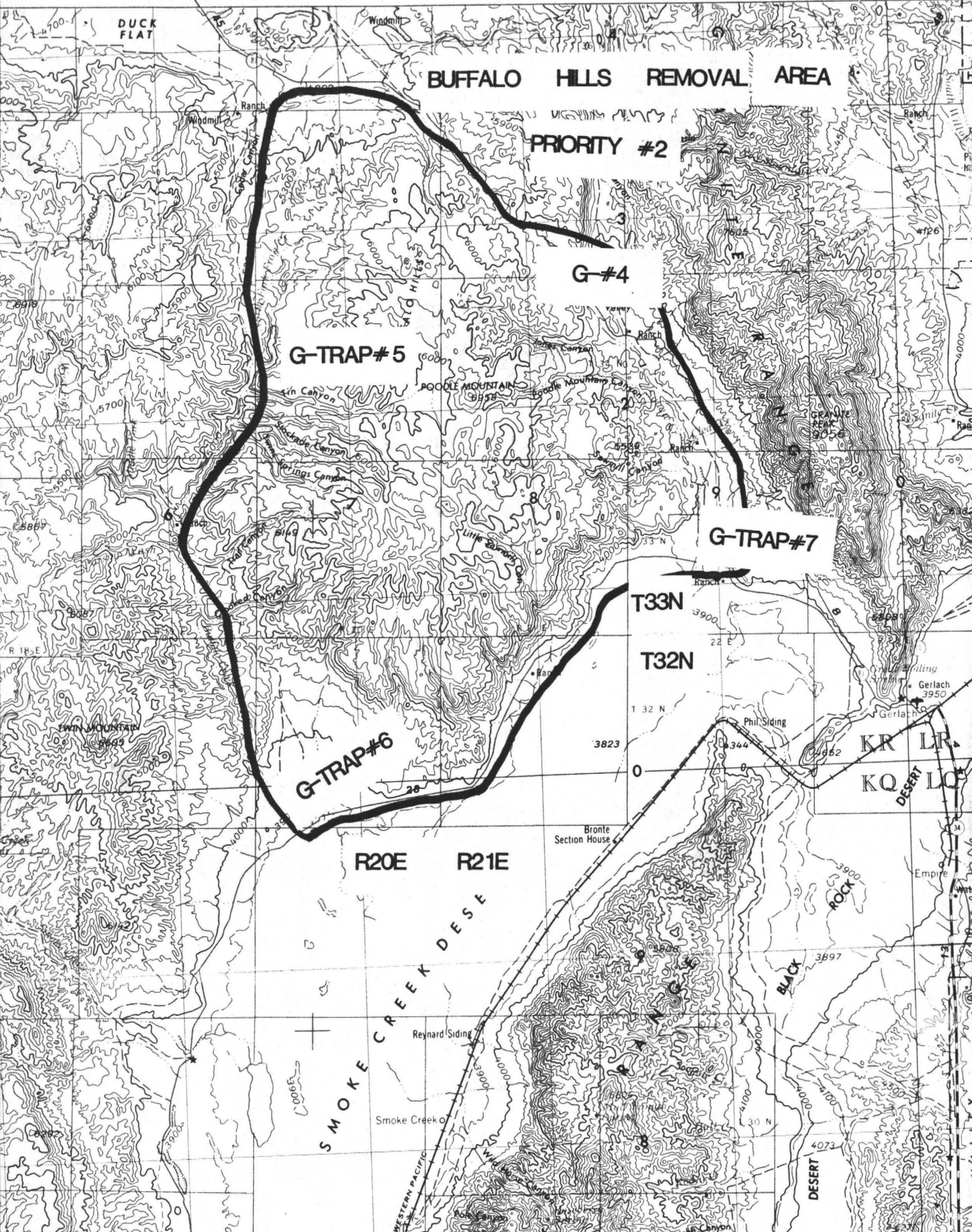
R21E

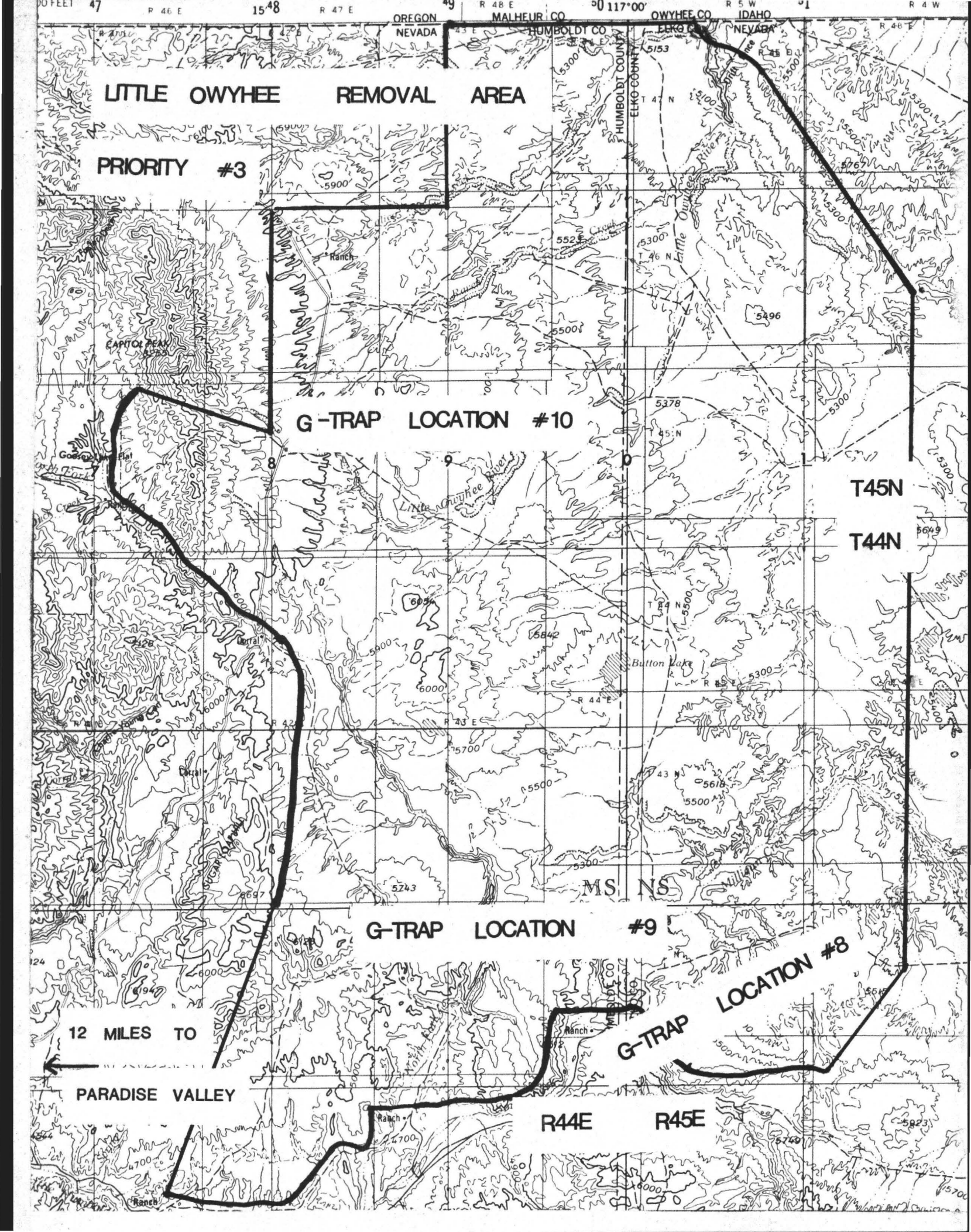
SMOKE CREEK DESE

KR LR
KQ LC
DESERT

BLACK ROCK

DESERT





LITTLE OWYHEE REMOVAL AREA

PRIORITY #3

G-TRAP LOCATION #10

G-TRAP LOCATION #9

G-TRAP LOCATION #8

T45N

T44N

**12 MILES TO
PARADISE VALLEY**

R44E

R45E

OREGON

NEVADA

MALHEUR CO

HUMBOLDT CO

ELKO COUNTY

OWYHEE CO

IDAHO

CAPITOL PEAK

Ranch

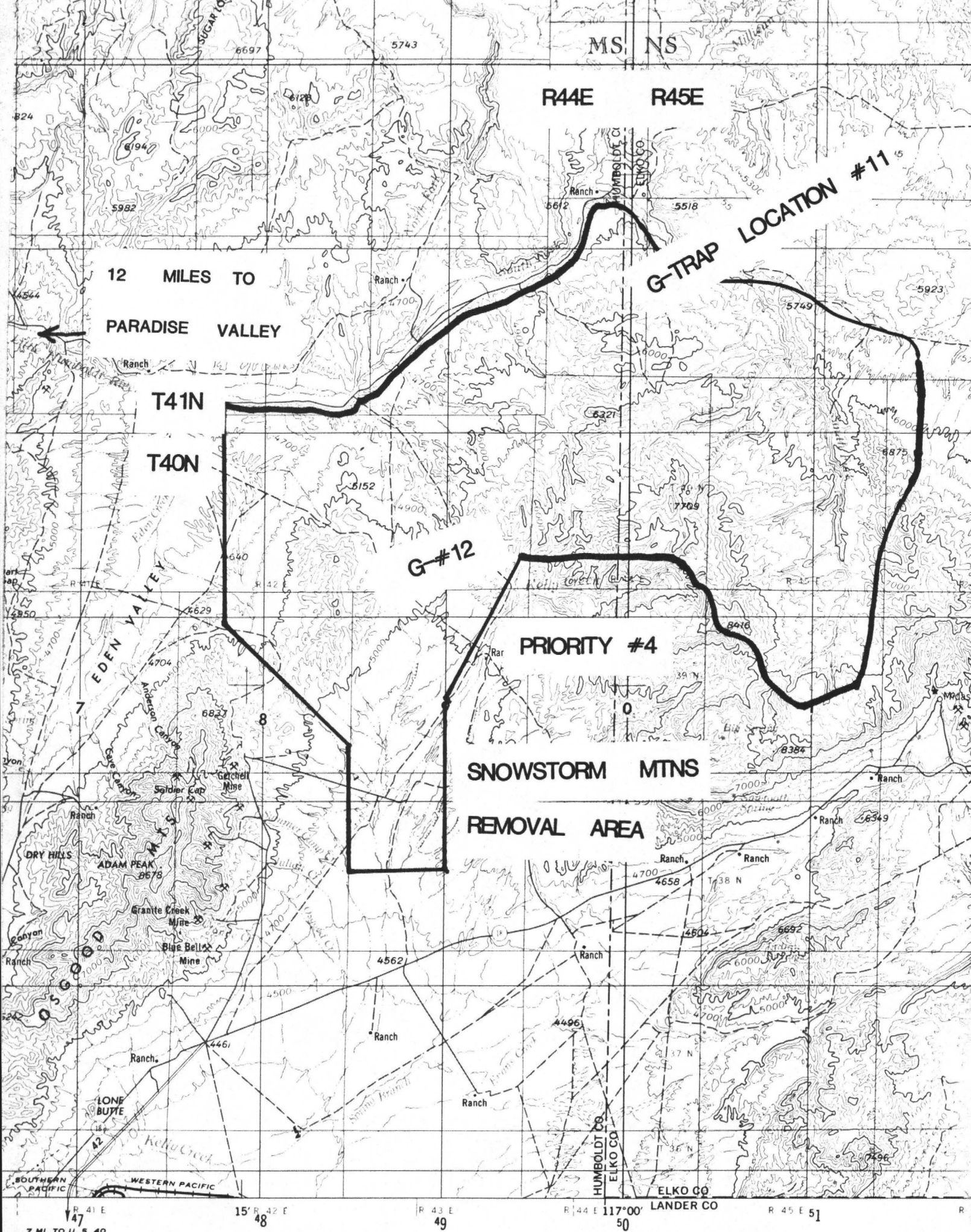
Button Lake

MS NS

Ranch

Ranch

Ranch



MS. NS

R44E

R45E

G-TRAP LOCATION #11

12 MILES TO

PARADISE VALLEY

T41N

T40N

G-#12

PRIORITY #4

SNOWSTORM MTNS

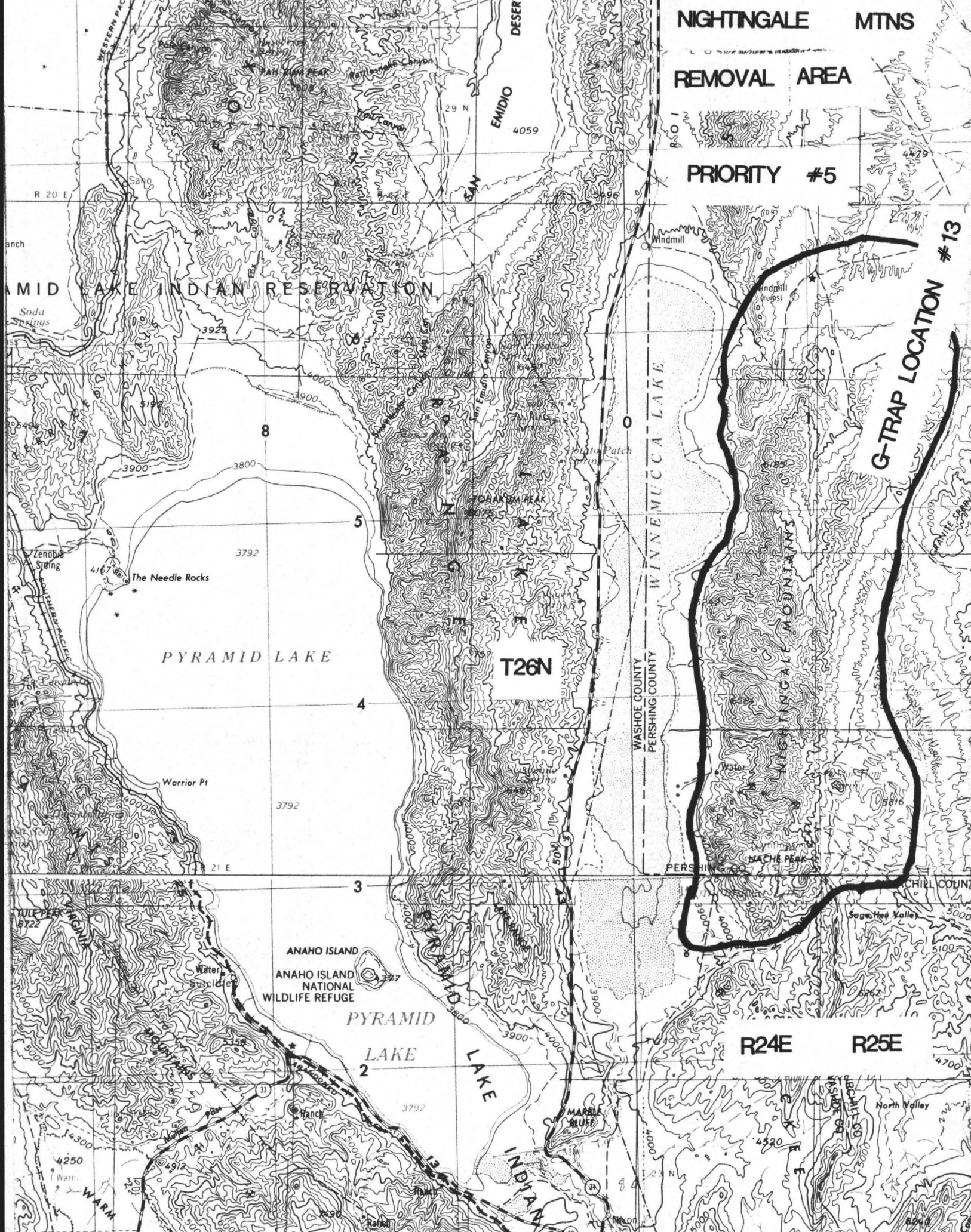
REMOVAL AREA

NIGHTINGALE MTNS

REMOVAL AREA

PRIORITY #5

G-TRAP LOCATION #13



PYRAMID LAKE INDIAN RESERVATION

PYRAMID LAKE

T26N

WINNEMUCCA LAKE

WASHOE COUNTY
PERSHING COUNTY

PERSHING CO. CHILL COUNTY

ANAHO ISLAND
ANAHO ISLAND
NATIONAL
WILDLIFE REFUGE

PYRAMID
LAKE

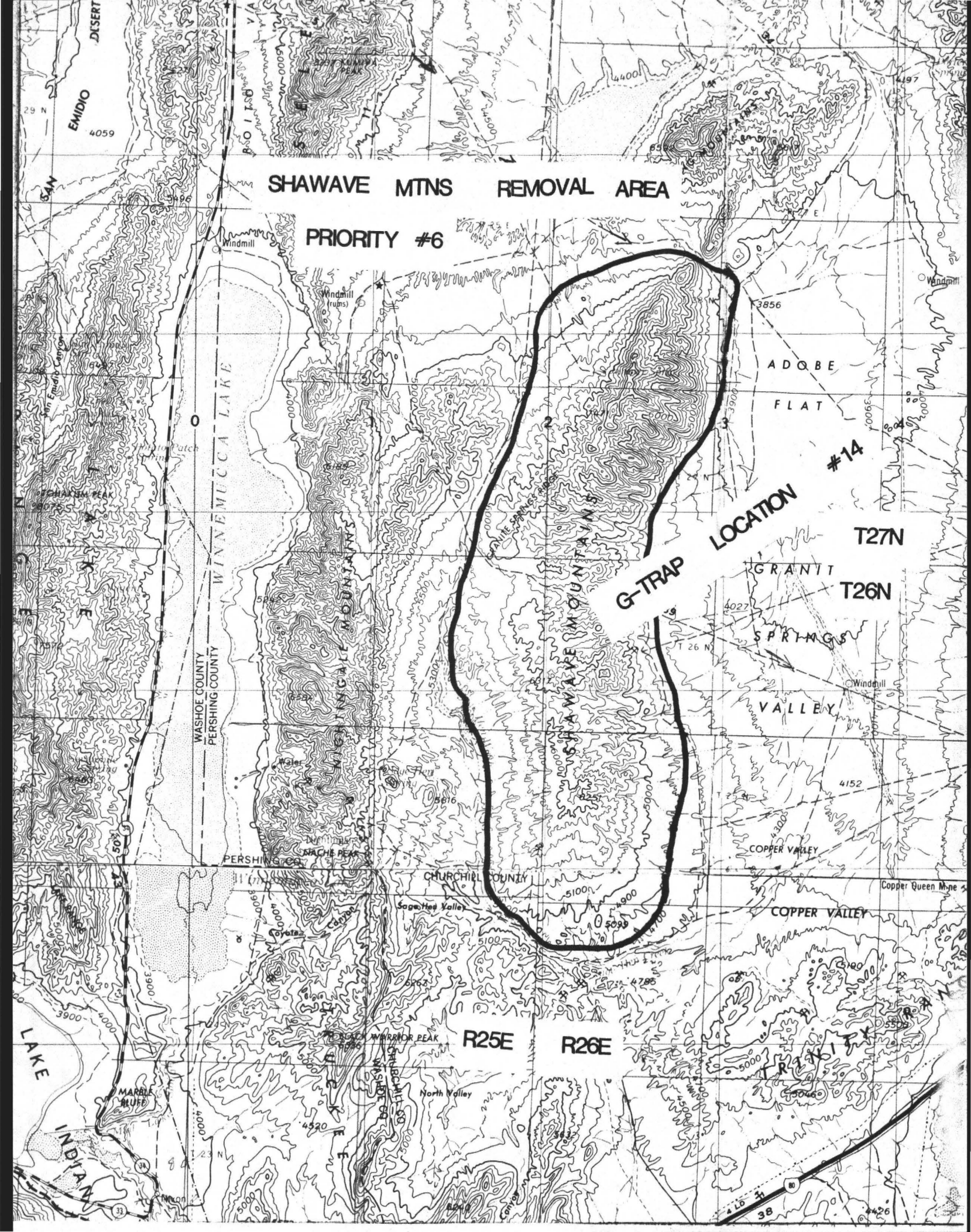
R24E

R25E

MARBLE
BLUFF

North Valley

WARM



SHAWAVE MTNS REMOVAL AREA

PRIORITY #6

G-TRAP LOCATION

#14

T27N

T26N

R25E

R26E

COPPER VALLEY

VALLEY

SPRINGS

GRANITE

ADOBÉ

FLAT

SHAWAVE MOUNTAINS

SAGE VALLEY

WINNEMUCCA LAKE

EMIDIO DESERT

WASHOE COUNTY

PERSHING COUNTY

CHURCHILL COUNTY

COPPER VALLEY

LAKE INDIAN

MARBLE BLUFF

WARRADOR PEAK

SAGE VALLEY

COPPER QUEEN MINE

VALLEY

SPRINGS

GRANITE

ADOBÉ

FLAT

SHAWAVE MOUNTAINS

SAGE VALLEY

WINNEMUCCA LAKE

EMIDIO DESERT

WASHOE COUNTY

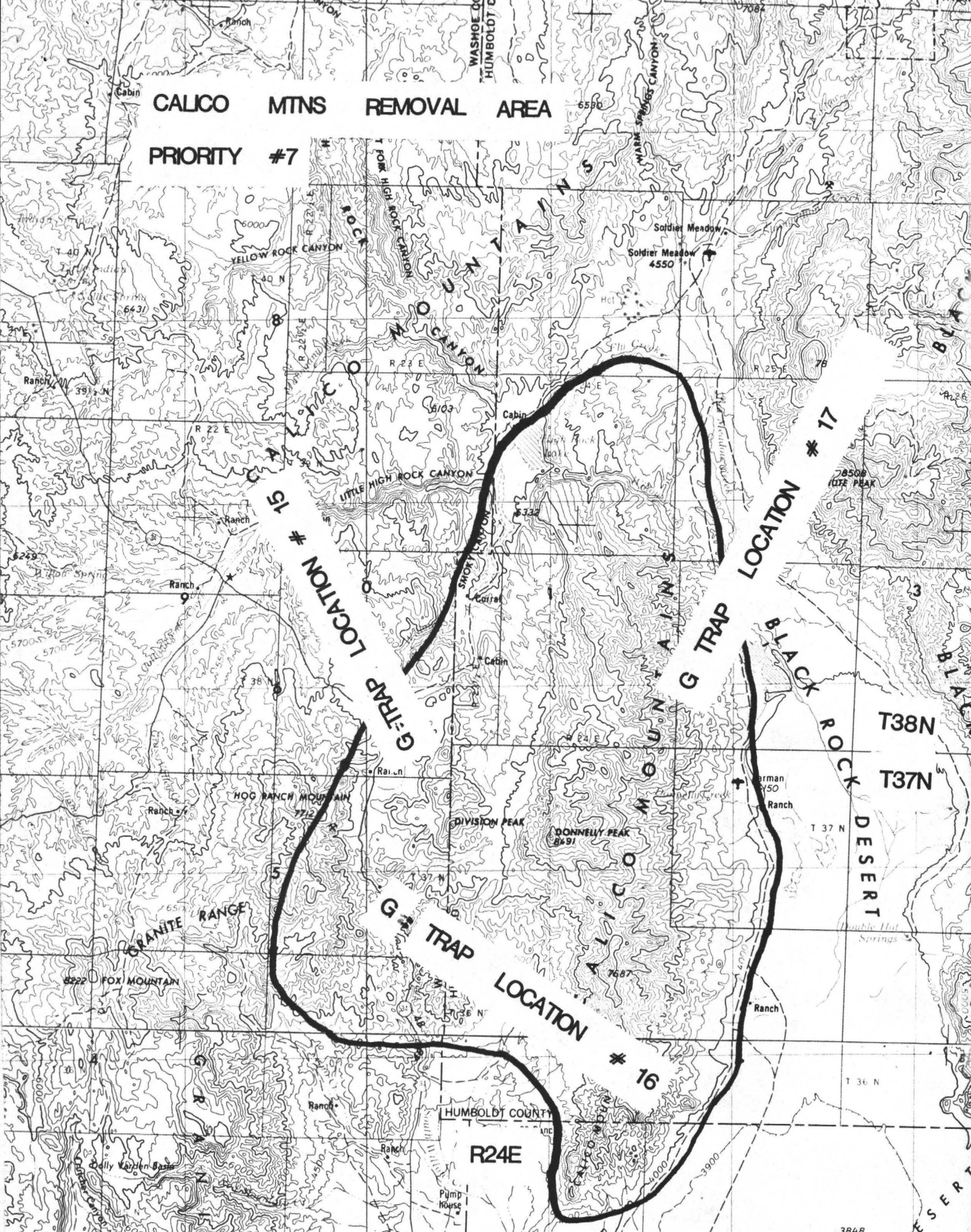
PERSHING COUNTY

CHURCHILL COUNTY

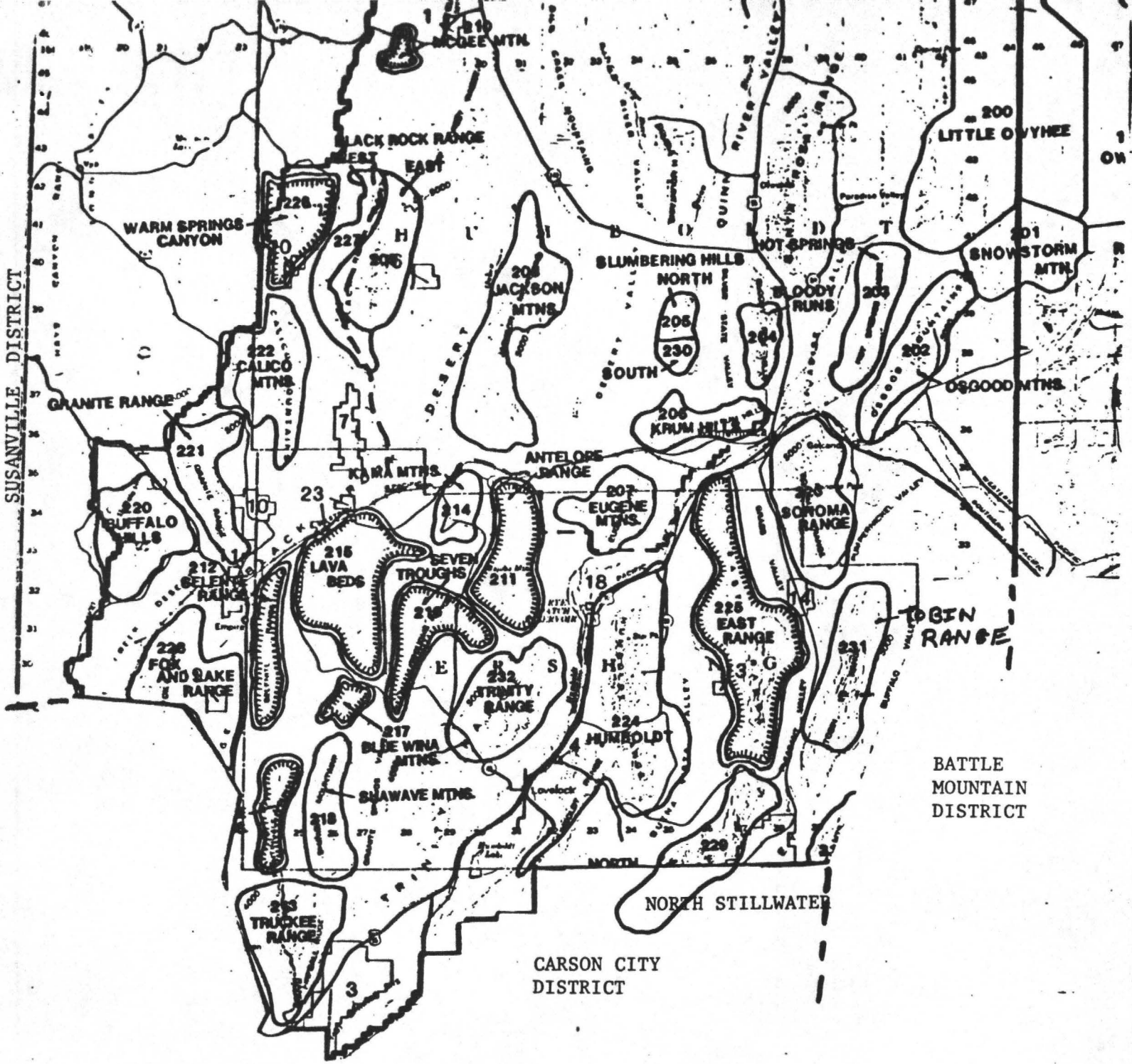
COPPER VALLEY

CALICO MTNS REMOVAL AREA

PRIORITY #7





SUSANVILLE DISTRICT

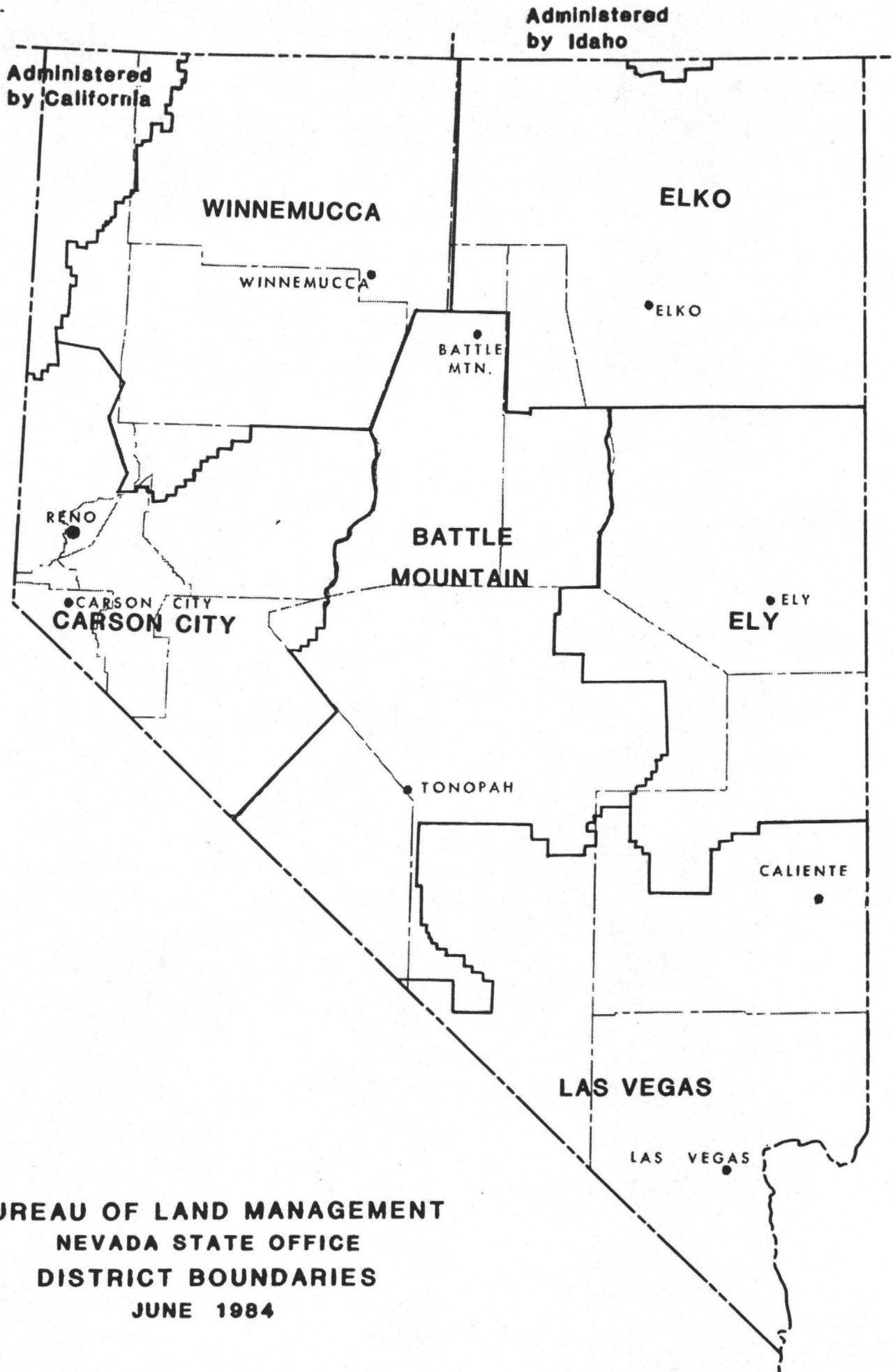


BATTLE MOUNTAIN DISTRICT

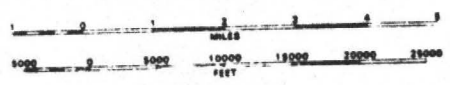
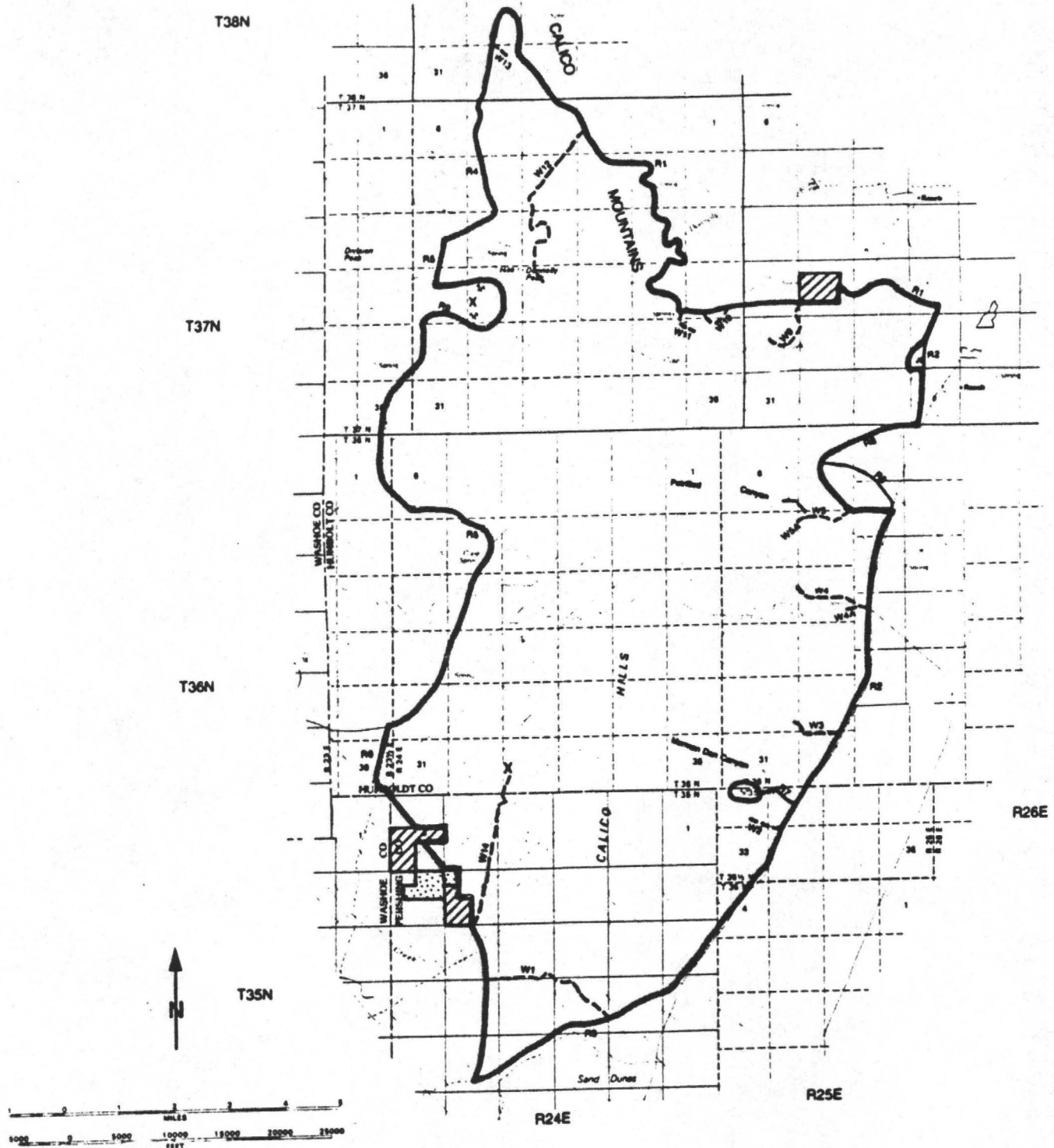
CARSON CITY DISTRICT









ATTACHMENT #2


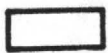
-  = Wild Horse Herd Area Boundary
-  = Burro Herd Area Boundary and Wild Horse Herd Boundary



BUREAU OF LAND MANAGEMENT
NEVADA STATE OFFICE
DISTRICT BOUNDARIES
JUNE 1984

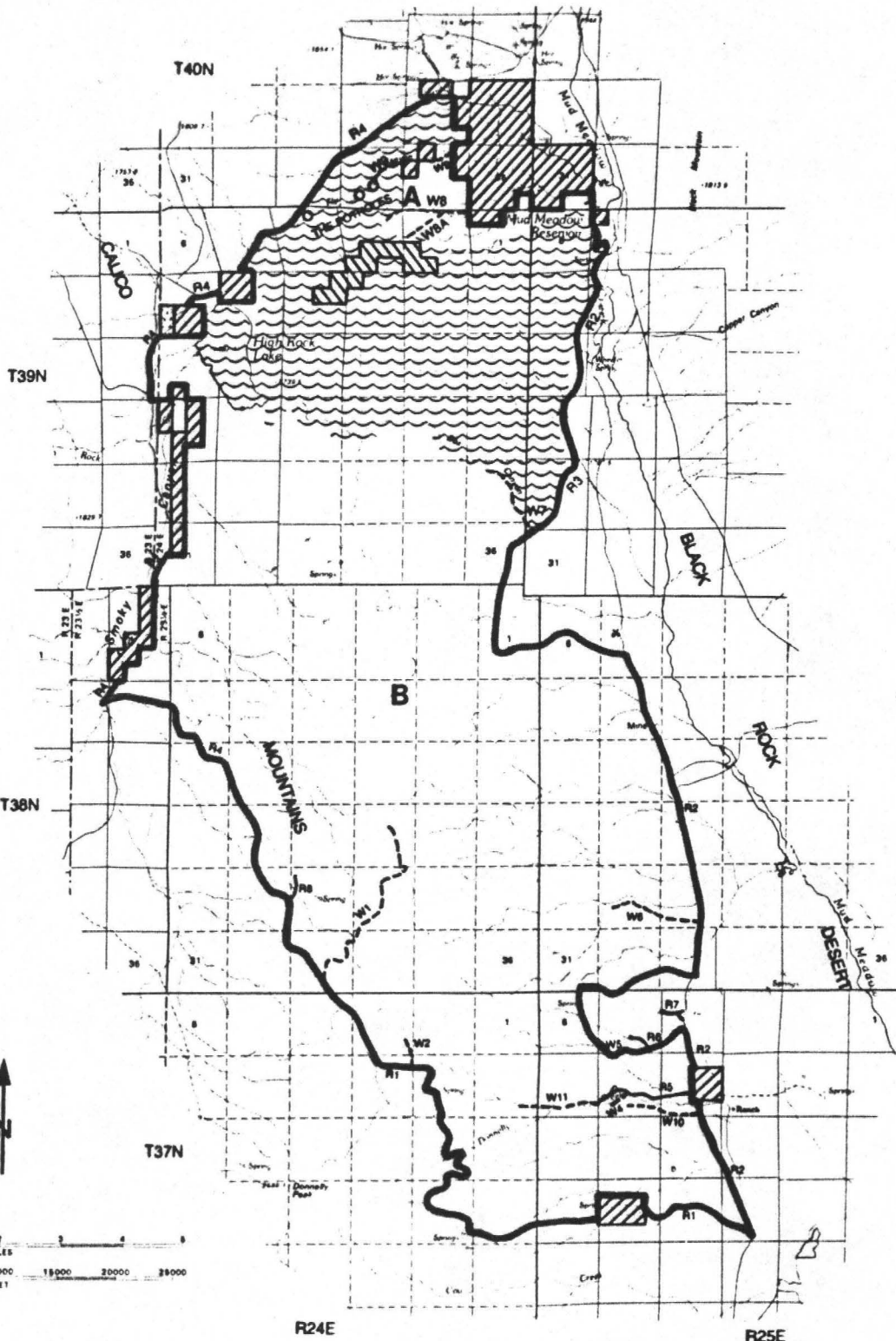









-  PRIVATE LAND (SURFACE & MINERALS)
-  PRIVATE SURFACE - PUBLIC MINERALS
-  W. S. A. BOUNDARY
-  ROAD
-  WAY
-  PROSPECT
-  MINE
-  GRAVEL PIT


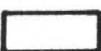

-  PRELIMINARILY RECOMMENDED SUITABLE (None)
-  RECOMMENDED NONSUITABLE



NV-020-019 CALICO MOUNTAINS RECOMMENDATIONS



-  PRIVATE LAND (SURFACE & MINERALS)
-  PRIVATE MINERALS - PUBLIC SURFACE
-  PRIVATE SURFACE - PUBLIC MINERALS
-  W. S. A. BOUNDARY
-  ROAD
-  WAY
-  GRAVEL PIT

-  PRELIMINARILY RECOMMENDED SUITABLE
-  RECOMMENDED NONSUITABLE
-  ZONE (See Text)

NV-020-007 HIGH ROCK LAKE RECOMMENDATIONS

R19E

R20E

R21E

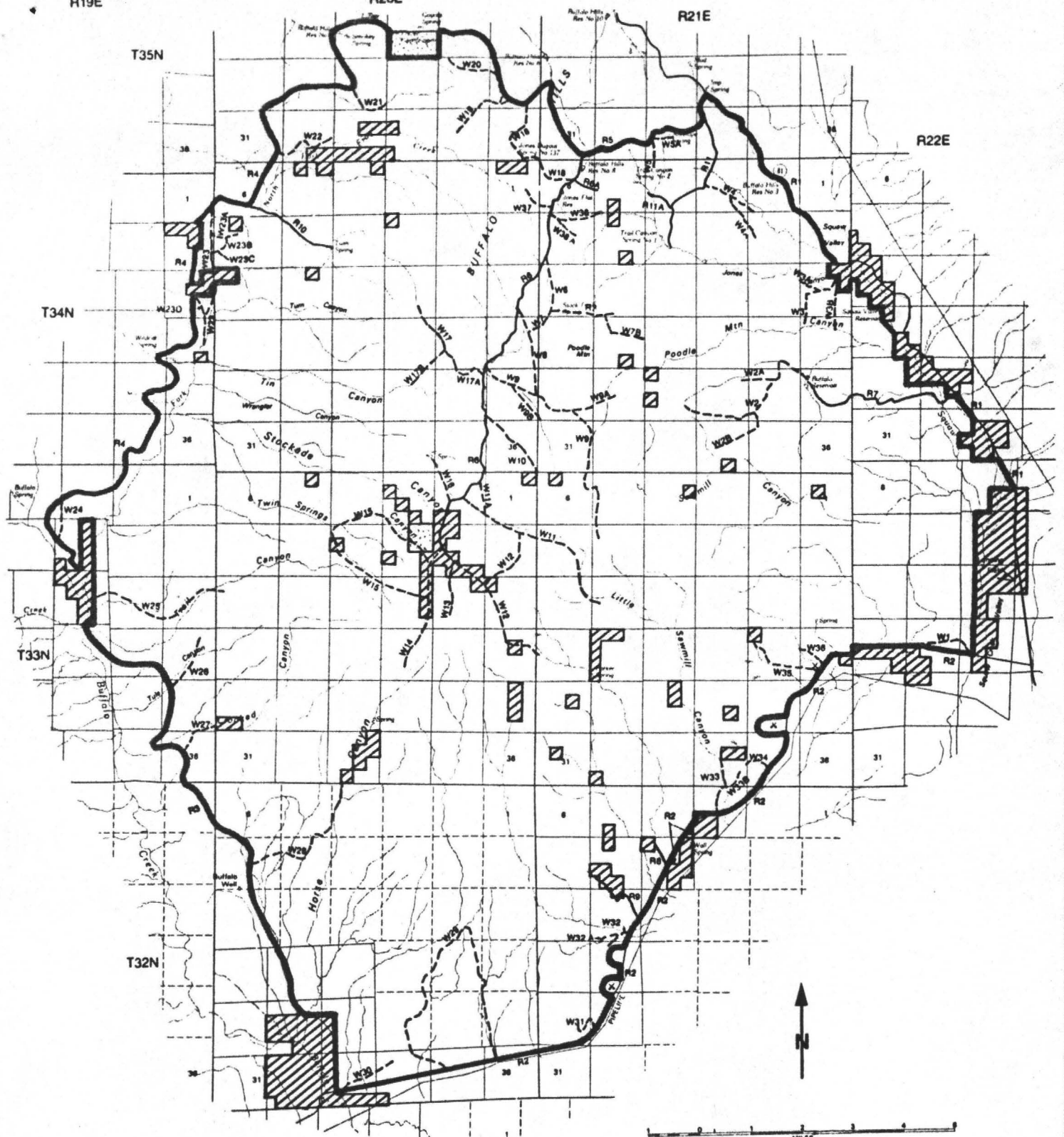
R22E







T35N

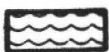

T34N

T33N

T32N

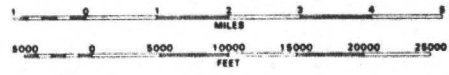
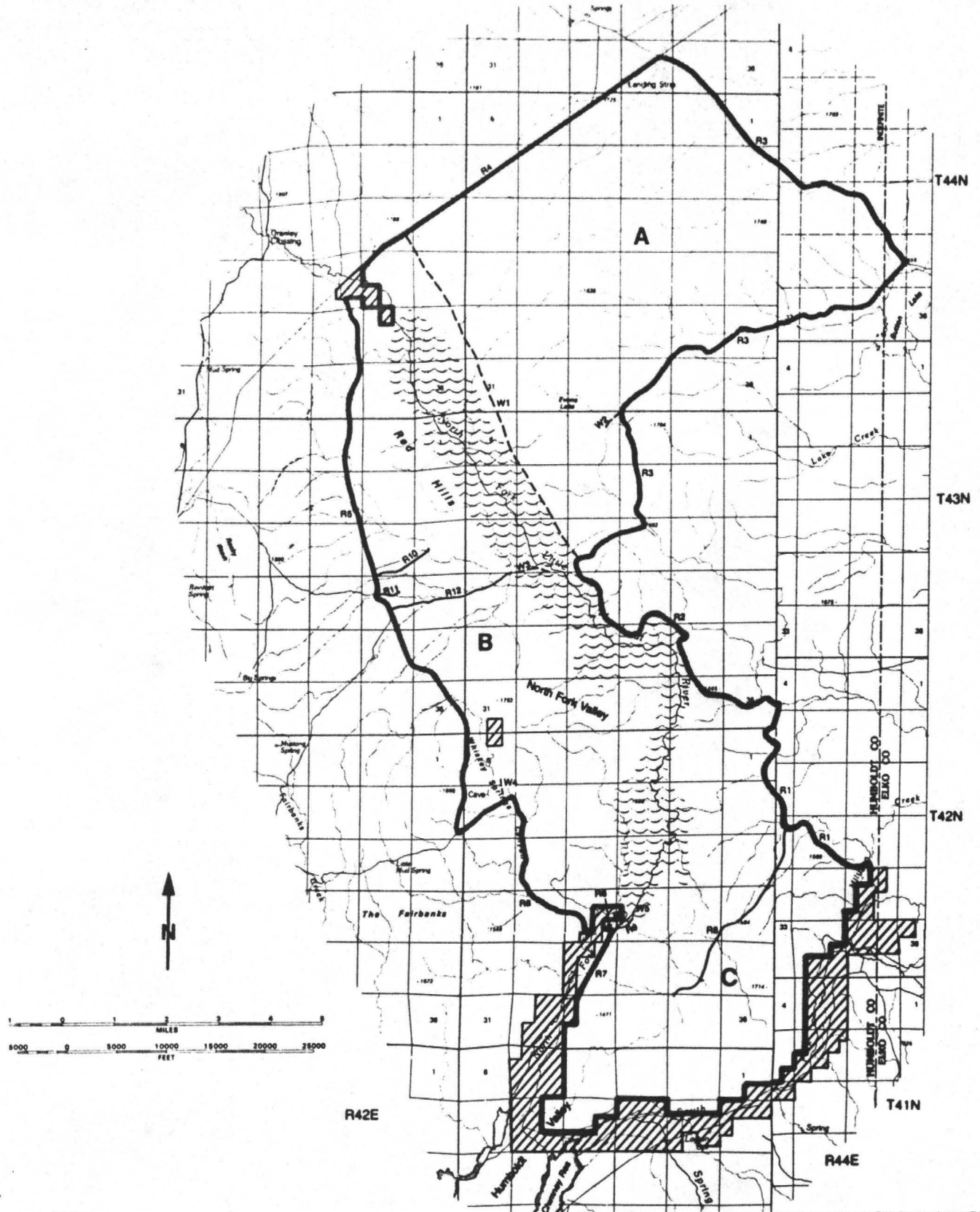


-  PRIVATE LAND (SURFACE & MINERALS)
-  PRIVATE SURFACE (PUBLIC MINERALS)
-  W. S. A. BOUNDARY
-  ROAD
-  WAY
-  GRAVEL PIT

-  PRELIMINARILY RECOMMENDED SUITABLE (None)
-  RECOMMENDED NONSUITABLE



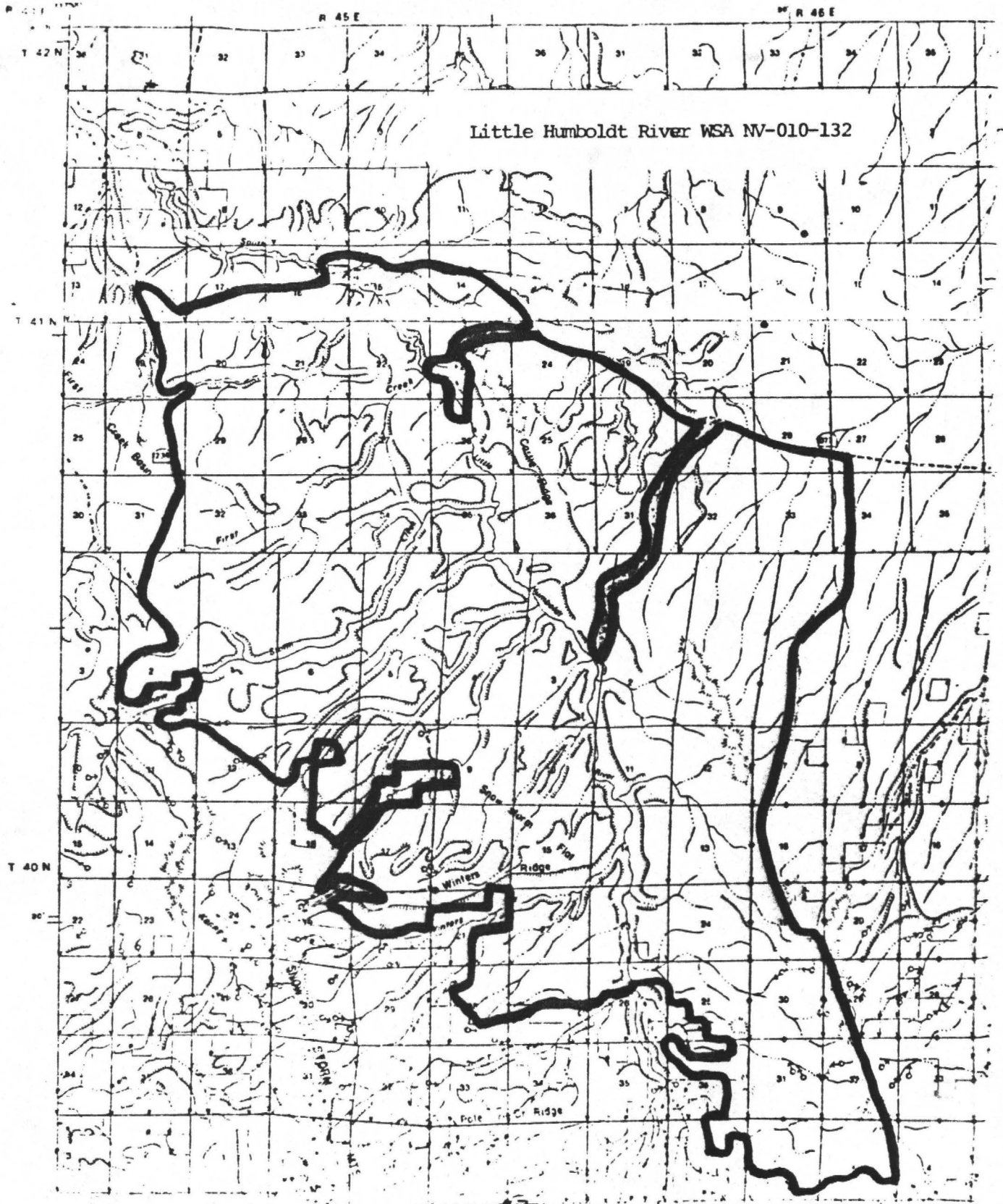
NV-020-012, CA-020-618 & 621 POODLE MOUNTAIN RECOMMENDATIONS

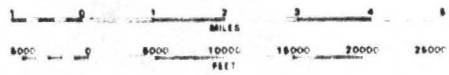
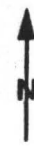
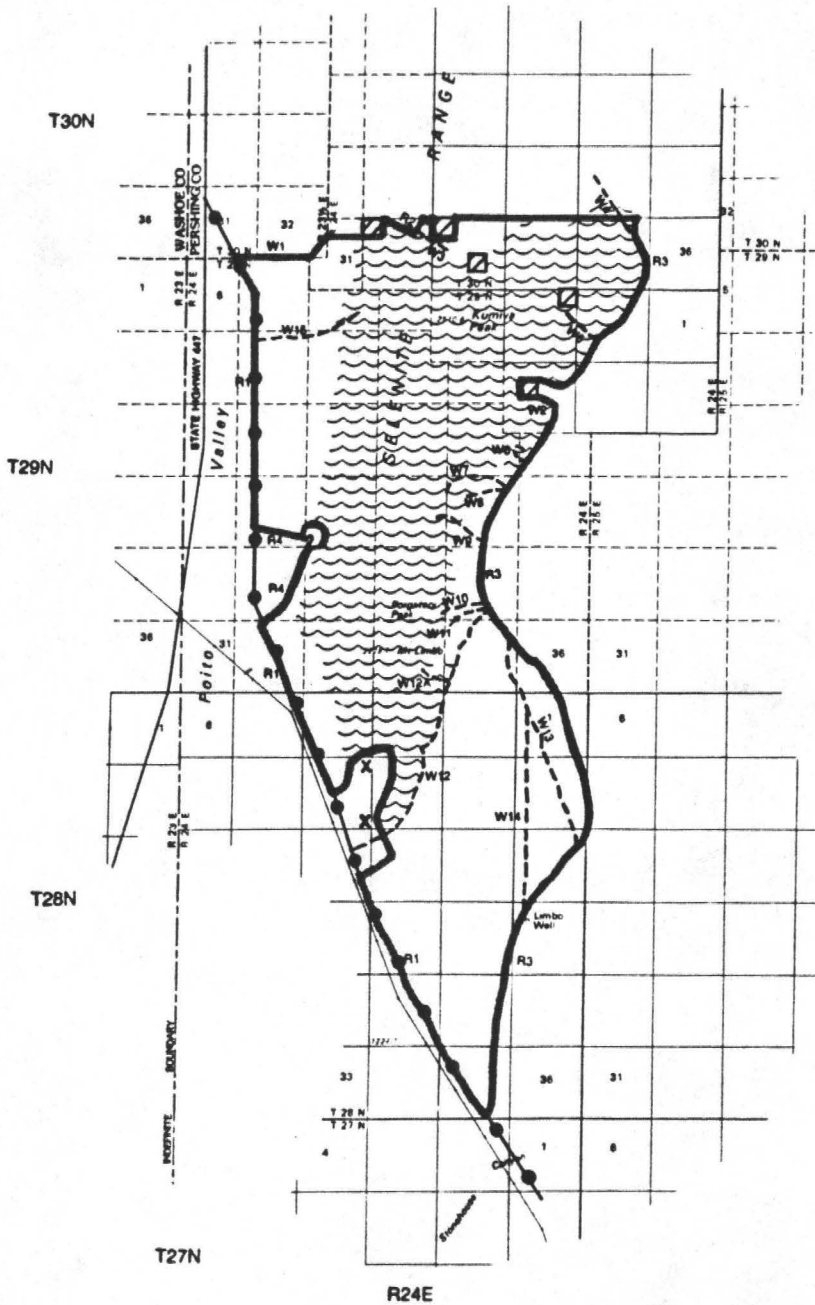








- PRIVATE LAND (SURFACE & MINERALS)
- W.S.A. BOUNDARY
- ROAD
- WAY
- PRELIMINARILY RECOMMENDED SUITABLE
- RECOMMENDED NONSUITABLE
- ZONE (See Text)

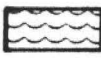


**NV-020-827 NORTH FORK LITTLE HUMBOLDT RIVER
RECOMMENDATIONS**





-  PRIVATE LAND(SURFACE & MINERALS)
-  W.S. A. BOUNDARY
-  ROAD
-  WAY
-  PROSPECT
-  POWER LINE

 **PRELIMINARILY RECOMMENDED SUITABLE**

 **RECOMMENDED NONSUITABLE**



**NV-020-201 MT. LIMBO
RECOMMENDATIONS**

July 10, 1989

7-10-89

APPEAL FROM PORTIONS OF 'WILD HORSE REMOVAL AND BURRO [GATHERING] PLAN FOR SEVEN HERD MANAGEMENT AREAS' IN THE WINNEMUCCA DISTRICT OF U. S. BUREAU OF LAND MANAGEMENT, AS DESCRIBED IN DRAFT PLAN DATED JUNE 9, 1989.

Mr. Ron Wenker, Winnemucca District Manager,
Bureau of Land Management,
705 E. 4th St., Winnemucca, Nevada, 89445.

Dear Mr. Wenker:

In accordance with 43 CFR 1610.5-3(b), I am ^{protesting} ~~appealing~~ the proposed action of the Nevada State Director of BLM and the Winnemucca District to remove horses from Little Owyhee Desert, Buffalo Hills, Snowstorm Mts., Nightingale Mts., and Shawave Mts., in the numbers indicated. The numbers of horses which would be left in these herd areas do not constitute viable herds and seem to be a disguised plan for extinction of these herds. The overall density would be far less than one horse per square mile remaining, and cannot be justified by any rational criteria.

These herds are definitely beneficial to the areas they occupy, grazing lightly over large areas, and in their droppings distributing viable seeds which sprout to the advantage of all animals, wild or domestic. Upon death they leave, for the benefit of the range, all of the nutrients contained in their bodies. In contrast, domestic grazers have a continuous negative impact on the range. The AMLs for these protested herd areas should allow for at least 500 per herd area or one horse per square mile, whichever is greater.

The numbers remaining would then be: for Little Owyhee Desert, 648; and for the other herds listed above, 500 wild equids.

The removal of the small herd of 17 burros from the Shawave Mts. would seem to be in response to a malicious intent and not justifiable by any criteria.

Attached to this ^{protest} ~~appeal~~ are copies of data previously submitted by me concerning the numbers of horses essential for viable herd populations.

Yours sincerely,

Craig C. Downer
P. O. Box 456
Minden, Nevada 89423

Enclosures