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Nevada First Corporation
Box 490
Winnemucca, NV 89446

United States
Department of Interior
Bureau of Land Management
Winnemucca District Office
705 East 4th Street
Winnemucca, NV 89445

July 5, 1992

Mr. Scott Billing
Paradise-Denio Area Manager:

The permittee of the [REDACTED] Little Owyhee Grazing Allotment and owner of private property within said allotment protests the Bureau of Land Management's proposed wild horse gather plan (4700 NV-248) dated 25 June 1992, as written for the following reasons:

1. Periodic droughts are the norm in Northern Nevada. The CRMP level of 200 horses, based on the use of both private and public resources, sought to establish a number that would avoid conflicts and resource degradation, to ensure that a thriving ecological balance would exist. The BLM's inability to comply with the terms of the CRMP has placed horses, wildlife, riparian areas and livestock grazing in jeopardy. Any plan that does not take into account immediate and future use fails. Past BLM performance indicates that a gather that removes only enough horses to prevent today's tragedy will encourage tomorrow's. We demand that the BLM revise its policy of crisis management and abide by the limits of the resource.

2. A certain meeting on May 27, 1992 with representatives from the BLM, Nevada Department of Fish and Wildlife, WHOA and Circle A Ranches/NFC concluded that because of drought conditions, the wild horse population should be reduced to the priorly agreed to number as soon as possible.

3. The permittee believes that the BLM's proposed plan is in violation of multiple use doctrine. Adding and hazing horses to the South Fairbanks pasture would create a herd of 500 horses, more or less, using a resource rated for 94 head of horses. Livestock then would not be licensed to use the South Fairbanks pasture. This pasture is the permittee's most important winter grazing area. No plan should give preference to horses over wildlife and livestock.

4. The proposed plan relies heavily upon private property within the Fairbanks pasture without compensation for the landowner. One-half of the water gap at Rodear Flat is accessed by using private land. The so-called seep at the canyon mouth of Milligan Creek is but a fraction of the available water that horses use in this area; adjoining private lands provide the water for the balance of their needs. The proposal is dependent upon free use of private property. The landowner demands that the BLM comply with the appropriate laws.

5. The full number of horses outside of the HMA are not accounted for in the proposal. The horses outside the HMA repeatedly use private property. The permittee demands that the BLM remove all horses outside of the HMA in accordance with the applicable regulations.

6. The BLM must not seek to appropriate the waters of the State of Nevada. Attempting to find and use underground waters for wild horses misuses taxpayer dollars. Rather the BLM must keep horse numbers in line with historical lows of surface water flows.

7. The BLM is requesting permittee to assist in an appropriate management level plan. The appropriate horse level is known. We demand that the BLM must first formulate a plan that reduces horse populations to the allotments rated capacity.

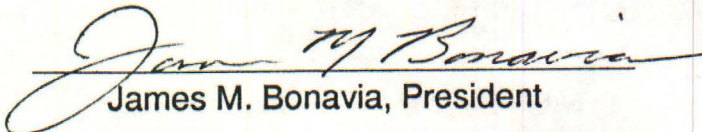
8. Permittee has allowed, under cooperative agreements, the use of his private property to maintain multiple use concepts. If the proposed plan is followed as written, free access to use his private property shall be denied.

9. To suggest that it is more cost effective to deny livestock licensing than it is to acquire the necessary funding to remove the excess wild horses ignores the long term costs of casual range management. To predict that the current drought will end soon and that the problem will go away is not a prudent course of action.

10. To misuse natural resources and to willfully use and damage the permittee's private property can not be in the best interests of the general public. Responsible government should serve and not obstruct the interests of private citizens.

11. The permittee believes wild horses, wildlife and livestock can utilize the varied resources of the Little Owyhee Allotment. Appropriate resource management must start now. The proposed gather plan must be amended to provide for a complete gather.

Nevada First Corporation


James M. Bonavia, President

CC Dawn Lappin ✓
Jim Jeffress
Robert Schweigert