



United States Department of the Interior

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



IN REPLY REFER TO:

4700
(NV-026.8)

FEB 05 1992

Dear Interested Party:

Enclosed is a draft Wild Horse and Burro Removal Plan for Checkerboard Lands within the Sonoma-Gerlach Resource Area located in the Humboldt, Trinity Range and Antelope Range Herd Areas, and the Hot Springs Mountains. The purpose of the removal is to remove animals that were missed during previous captures and to remove animals that have permanently moved into the checkerboard lands.

The action is in conformance with the Sonoma-Gerlach MFP-III decision WH&B 1.3. Which is to remove all wild horses and burros from checkerboard Herd Areas unless a cooperative agreement providing for the retention and protection of wild horses and burros is consummated with the private land owner(s). Cooperative agreements have not been obtained for the areas listed above.

Please provide your comments by March 6, 1992. If you have any questions regarding the removal plan contact Tom Seley at (702) 623-1500.

Sincerely yours,

Bud Cribley
Area Manager
Sonoma-Gerlach Resource Area

Enclosure

any animal released sterilized must be permanently marked, preferably on hip-



**COMMISSION FOR THE
PRESERVATION OF WILD HORSES**

**Stewart Facility
Capitol Complex
Carson City, Nevada 89710
(702) 687-5589**

COMMISSIONERS

Dan Keiserman,
Las Vegas, Nevada
Michael Kirk, D.V.M., *Chairman*
Reno, Nevada
Paula S. Askew
Carson City, Nevada
Steven Fulstone
Smith Valley, Nevada
Dawn Lappin
Reno, Nevada

February 27, 1992

Bud Cribley, Area Manager
Sonoma-Gerlach Resource Area
BLM-Winnemucca District Office
705 East 4th Street
Winnemucca, Nevada 89445

Dear Mr. Cribley,

Thank you for the opportunity to review and comment on the draft wild horse and burro removal plan for the Humbolt, Trinity, and Antelope Range.

We understand and are aware of the status of the checkerboard lands and the difficulties surrounding the management of those areas. We also recognize the necessity of the removal of the animals from those checkerboard lands, however, we are wondering what plans you may have for the future to prevent the continued migration of wild horses onto those private lands. Referring to prior gathers in these areas, horses migrate onto the private lands and are removed, shortly thereafter horses migrate again and are removed again. A short term approach is the removal of the offending animals but as a long term strategy how can you prevent these removals from continuing? Have you proposed any management actions to help this situation, if so please provide us with that data.

If there is a project that the Commission may be able to help you with, please keep our grant program in mind.

On page 2, D. "Population and Removal Data", at the end of the section you state "Prior to release, a fertility control procedure may be performed on the animals." The Commission is in support of fertility control measures in Nevada and is working hard with the Bureau to develop these programs. We must insist however, that before any fertility control procedures are considered for any areas that the District develop guidelines and objectives for such a program, that a marking system be developed for tracking the animals to document necessary data, and that the impacts both short term and cumulative be identified prior to any such implementation. We also feel that an EA or EIS would need to be done to determine the impacts of such fertility manipulations on the herds. If you would add some wording to that affect, on page 2, we would have absolutely no problem with removal and manipulation.

Lastly, there is other information that I would like to request for our files. 1) Wild horses are removed from checkerboard areas when they have established permanent residency

Bud Cribley, Area Manager
February 27, 1992
Page 2

on those private lands. Could you please provide us with the data showing that the wild horses in questions have established permanent residency and are not just making incidental use of those areas. 2) Wild horses are usually removed from checkerboard lands at the request of the landowner. If the landowner has not complained, a gather in those areas is usually at the bottom of the priority list, especially when funding is a limiting factor. Would you please provide us with copies of letters requesting removal of those animals.

We do not object to the removal of these animals under the circumstances as long as our recommendations for fertility control manipulations are followed. The above information that we are requesting (from all Districts), will help us to keep our files current.

If you have any questions, please feel free to call.

Sincerely,

Catherine Barcomb

CATHERINE BARCOMB
Executive Director

2-24-92

W H O A

WILD HORSE ORGANIZED ASSISTANCE
P.O. BOX 555
RENO, NEVADA 89504
(702) 851-4817

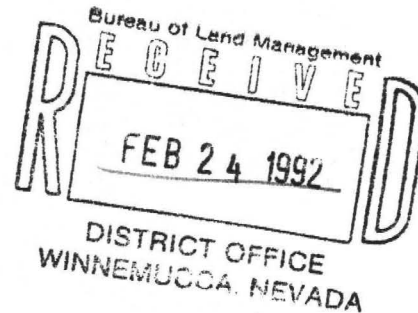
BOARD OF TRUSTEES

DAVID R. BELDING
JACK C. McELWEE
GORDON W. HARRIS

In Memoriam

LOUISE C. HARRISON
VELMA B. JOHNSTON, "Wild Horse Annie"
GERTRUDE BRONN

February 20, 1992



Mr. Bud Cribley, Area Manager
Bureau of Land Management
Sonoma-Gerlach Resource Area
705 East 4th Street
Winnemucca, Nevada 89445

Dear Mr. Cribley:

Thank you for the notice of the draft wild horse and burro removal plan for the Humbolt, Trinity, and Antelope Range. (Feb. 5, 1992, 4700 (NV-026.8))

As a long standing member of the Winnemucca CRMP, the Owyhee #1, and the Pershing CRMP committees, I am well aware of the checkerboard land status, and the agencies difficulty in their management. I am also aware the existing land owners requests for the removal of wild horses from these intermingled lands. However, the Bureau once this capture is completed must start planning on how you intend to prevent the drift of wild horses from the solid block public lands. Correct me if I err, but weren't all the wild horses removed from those lands before? I also would appreciate a response as to the names of the permittees/ranch that has requested another removal. WHOA does not object to the removal under these circumstances but we do wish to keep our files current on the requests.

WHOA does wish to provide comments pertaining to the population, the removal, and release of animals 10 years and older. Hence, we would appreciate your consideration of our comments and respond to a few questions.

D. POPULATION AND REMOVAL DATA

In your April 22, 1991 flights we find no listing of wild horses or burros in Antelope, Humbolt, Trinity, or Hot Springs. We do find mention of ferry time, distribution, and total for only the Antelope Range. Has there been a more recent survey, and if so, may we please have a copy of that data.

We note that prior to release, a fertility control procedure may be performed on the animals. Has the District developed guidelines and objectives; have you developed a marking system that would track these animals; and have you ascertained what herd management areas they would be

Page two
Winnemucca Checkerboard
February 20, 1992

released into, and what the impact of that release will have on the existing populations? It is not that we do not sympathize with the agencies dilemma of older animals, however we do not want the indiscriminant release, without forethought, and planning. Recently I attended a capture where horses had been gelded and released by the scientific community (no less) but none of the animals were marked in any way and we were unable to tell whether we had captured gelded animals and whether they were re-released, or whether we had sent them to Palomino to be adopted to an unsuspecting adopter. Nor would we want them released into an area where the existing population may be already under stress.

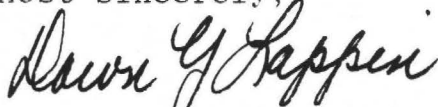
A. TRAPPING AND CARE

A. 2 You state that foals will not be left behind. I have now been on three capture operations where Palomino Valley Holding Facilities have instructed the District not to bring in any foals, nor mares with young foals. Has the District compiled a list of people who would wish to take the foals?

A. 12 Again, due to my attendance on all captures this year, I have learned there is still great reluctance in the humane destruction of deformed, sick, or injured animals. I cannot stress enough, that WHOA has sufficient confidence in the wild horse specialist or COR to perform this job. I would much prefer that animals falling into these categories, be put down at the capture site, then put through the additional stress of transport only to be put down at Palomino. Animals with old injuries (i.e. blind in one eye, etc.) that cause no problems with their survival on the range, should be left on the range, and not transported to Palomino.

If you have any questions please feel free to call.

Most sincerely,



Dawn Y. Lappin (Mrs.)
Director

cc: files

Mr. Billy R. Templeton, State Director

CATHY BARCOUB
Wild Horse

2-28-92



Anelope

STATE OF NEVADA
DEPARTMENT OF WILDLIFE

1100 Valley Road
P.O. Box 10678
Reno, Nevada 89520-0022
(702) 688-1500
Fax (702) 688-1595

Nevada Department of Wildlife
Region I Ph-423-3171
300 West B Street
Fallon, Nevada 89408

BOB MILLER
Governor

WILLIAM A. MOLINI
Director

February 28, 1992

Mr. Bud Cribley
Sonoma-Gerlach Resource Area
Bureau of Land Management
705 East Fourth Street
Winnemucca, Nevada 89445

RE: Wild Horse Removals

Dear Bud:

Our agency has reviewed the proposed removal of wild horses and burros from checkerboard lands in Pershing and Churchill Counties. We foresee no conflicts or adverse impacts to wildlife by the proposed action.

Thank you for consulting our agency.

Sincerely,

WILLIAM A. MOLINI, DIRECTOR

A handwritten signature in cursive script, appearing to read "Richard T. Heap, Jr.".

Richard T. Heap, Jr.
Region I Manager
Region I

REL:rl/

CC: Habitat, Reno
Phil Benolkin

99

3-25-92



United States Department of the Interior

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



IN REPLY REFER TO:

4700
(NV-026.8)

MAR 25 1992

Commission for the Preservation
of Wild Horses
Ms. Cathy Barcomb
Stewart Facility
5500 Snider Avenue
Carson City, NV 89710

Dear Ms. Barcomb:

In response to your February 27, 1992 letter, we received the initial request to remove wild horses from the Humboldt Herd Area (HA) from R.J.B. Development Co. in December 1989. They requested the removal of approximately 25 wild horse from their land in the Rye Patch Allotment which is in the Humboldt HA. We have also received two letters requesting the removal of all wild horses and burros from private land owned by the Atchison, Topeka and Santa Fe Railroad in the Antelope Range, Humboldt and Trinity Range HA's, and from the Hot Springs Mountains. I have attached copies of the requests for your files.

The only area where wild horses and burros have immigrated back into is the Antelope Range HA. The horses found in the Antelope Range HA appear to have immigrated into the area from the Seven Troughs HMA after completion of the 1987 removal. The following chart shows the number of horses found in the Antelope Range since January 1988.

Herd Area	Jan. 1988	Apr. 1989	Feb. 1990	Feb. 1991	July 1991	Feb. 1992
Antelope Range	25	114	75	114	213	175

The horses found in January 1988 were observed while ferrying a helicopter into the Seven Troughs HMA. The April 1989 count is from a helicopter census while the remainder of horses were observed during fixed wing distribution flights.

The horses found in the Humboldt and Trinity Range HA's were missed during the last removal in those two herd areas. Several weeks after the 1986 removal of wild horses from the Humboldt HA, five horses were observed which had been missed during the removal. In April 1988 we received a report that 15 head of horses were seen in the Humboldt HA and five head in the Trinity Range HA. In January 1989 we found ten horses in the Humboldt HA, three while flying over the area and another seven horses were observed from the ground. Three horses were seen in the Trinity Range HA while ferrying a helicopter over the area in January 1989. The horses found in the Trinity Range HA closely resemble animals that were captured during the 1987 removal (paint horses) which

indicate that they were missed in 1987. It is not known how the burros found in the Hot Springs Mountains arrived in the area. We do know that they did not immigrate into the area since there are no adjacent HMA's and it is geographically isolated from the Truckee Range HA by Inter-State 80.

For your records I have attached the results of the July 1991 and February/March 1992 distribution flights, and the August 1991 aerial census results for the Trinity Range HA, Humboldt HA, North Stillwater HMA and Tobin Range HMA.

We are currently conducting a re-evaluation of the Blue Wing/Seven Troughs Allotments and have tentatively proposed a fence that would separate the Seven Troughs and Kamma Mountains HMA's from the Antelope Range HA. Once constructed this fence should stop the immigration of wild horses and reduce or eliminate the need for any future removals from the Antelope Range HA. We have discussed the possibility of applying for a grant through the Commissions grant program to fund part of the proposed project.

On page 2, D. "Population and Removal Data" where it is stated that a fertility control procedure may be performed on the animals, we will add the following statement; A fertility control procedure and subsequent release of animals into another HMA on the District will not take place unless guidelines and objectives have been developed and approved, and an environmental assessment of the proposed action has been prepared.

If you have any questions please feel free to contact Tom Seley at 623-1500.

Sincerely yours,



Bud Cribley, Area Manager
Sonoma-Gerlach Resource Area