



United States  
Department of  
Agriculture

Animal and  
Plant Health  
Inspection  
Service

Plant Protection  
and Quarantine

1550 So. Wells Ave.  
SUITE 204  
Reno, NV  
89502

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10/28/91

October 28, 1991

Terry Jay-Executive Director  
NV Commission On the Preservation of Wildhorses  
Stewart Facility  
Building No. 6  
Mark Twain  
Carson City, NV 89710

Dear Ms. Jay:

Enclosed you will find the consultation draft of the Environmental Assessment for the Winnemucca BLM District. This is a consultation draft only; a final draft will be written after the consultation process is complete.

Please review this draft, and mail your written comments (with supporting biological/scientific data if applicable) to this office within thirty (30) days of receipt of this letter. A Negative response is not required.

Upon completion of your review, please return the draft EA and all attachments to this office.

Your timely response and comments are greatly appreciated. If you desire further information or have any questions about this EA or its contents please call my office at (702-784-5701).

Sincerely,

George H. Nash  
Officer-In-Charge



APHIS—Protecting American Agriculture

SITE-SPECIFIC ENVIRONMENTAL ASSESSMENT  
TIERED TO THE 1987 FINAL ENVIRONMENTAL IMPACT STATEMENT FOR  
RANGELAND GRASSHOPPER COOPERATIVE MANAGEMENT PROGRAM

Winnemucca BLM District  
All of Humboldt, and Pershing  
Counties. Portions of Lyon,  
Washoe, and Churchill  
Counties Nevada.

Assessment Number: .  
NV-01-91

October 28, 1991

Prepared by:

U.S. Department of Agriculture  
Animal and Plant Health Inspection Service  
Plant Protection and Quarantine  
1550 South Wells Suite 204  
Reno, Nevada 89502



**COMMISSION FOR THE  
PRESERVATION OF WILD HORSES**

Stewart Facility  
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November 27, 1991

George H. Nash, Officer-In-Charge  
United States Department of Agriculture  
1550 South Wells Ave.  
Suite 204  
Reno, Nevada 89502

Dear Mr. Nash,

Thank you for the opportunity to comment on the consultation draft of the EA for the Winnemucca BLM District.

Our main concern would be to determine if this process is necessary. Depending on weather conditions in the winter and spring of 91/92, the problem may abate itself. I would urge APHIS to monitor the range as well as climatic conditions to determine if this particular pest control procedure is absolutely necessary and not to randomly operate as a preventative measure. It certainly is not necessary to rely solely on the traditional reactive or crisis-oriented approach but many other species of wildlife are affected by this procedure. To randomly operate would restrict the growth of the grasshoppers as well as the mormon crickets but does not outweigh the effects and dangers to other habitat users as well as the habitat itself.

We see that on page 17, wild horses have been addressed and mitigation proposed. Our concerns would have been the level of toxicity planned for the insecticides as well as the planned dates of flight for spraying over any of the herd areas. The level of disturbance during foaling season would be our concern. According to this consultation draft those concerns have been mentioned and APHIS has adopted the BLM policy with respect to flight scheduling.

As long as the use of low toxicity insecticides is required along with the limited duration of the treatments, we feel that if necessary this would be the better option as opposed to the "no-action" alternative. The destruction of grasses and forbs by

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grasshopper and/or mormon crickets would cause more local disruption of the food source to wild horses. It must be mandated that if the level of toxicity is increased from that proposed a new EA must be done and released for public comment.

If you have any questions, please feel free to contact me.

Sincerely,

CATHERINE BARCOMB  
Executive Director