



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-023.5)

April 26, 1988

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

Dear Ms. Lappin:

Enclosed is a copy of a draft Wild Horse Removal Plan for your review and comments.

Please submit your comments to our office no later than May 25, 1988.

Sincerely yours,

Gerald P. Brandvold
Acting District Manager

Enclosure

U.S. DEPARTMENT OF THE INTERIOR

BUREAU OF LAND MANAGEMENT

Winnemucca District Office

Sonoma-Gerlach Resource Area

WILD HORSE/BURRO MANAGEMENT

BUFFALO HILLS

WILD HORSE REMOVAL (GATHERING) PLAN

I. Introduction

The intent of this removal (gathering) plan is to outline the methods and procedures to be used in removing approximately 549 wild horses from the Buffalo Hills Herd Management Area (HMA). Refer to the attached maps for specific locations and to II. C. for additional specifics. The removal operation is scheduled to begin about October 3, 1988, and be completed by November 11, 1988.

II. General Area Description-Background Data

A. Location and Land Status

The geographical center of the Buffalo Hills HMA is located approximately 13 miles west of Gerlach, Nevada, and 55 miles northwest of Fernley, Nevada. The HMA is administered by the Sonoma-Gerlach Resource Area (RA). The HMA is situated entirely within the Buffalo Hills grazing allotment. The Buffalo Hills grazing allotment is part of the Buffalo Hills Planning Unit.

The Buffalo Hills HMA is roughly 36 miles long in a north-south direction and 12 miles wide in an east-west direction. The low country is dominated by shadscale-greasewood types. As elevation increases and soils change, these types give way to sagebrush - grass and juniper types.

The Buffalo Hills were flown December 15, 1978 (by fixed wing aircraft) to determine winter use areas and to try to form some generalizations about migration patterns and seasonal use areas within the herd use area. This flight showed that the majority of the horses congregated on the foothills on the east side of the range. The inventory conducted January 28, 1975, revealed an even distribution of animals throughout the range. The majority of the HMA is between 5,000-6,000 feet in elevation. During mild winters the wild horses will not move down to the lower elevations and will use the same general area yearlong. An aerial (helicopter) census will be conducted in July of 1988 - about 2.5 months prior to the removal. This census will help determine concentration of animals. In addition, the HMA will be inventoried about one week prior to the removal by a fixed wing aircraft to determine concentration of animals.

The area is comprised of approximately 132,410 acres; 123,498 acres (93%) of public lands and 8,912 acres (7%) of private lands.

B. Reference to Land Use Plan (LUP)

The LUP for the Sonoma-Gerlach RA was 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 Areas (HAs).

The appropriate Management Level (AML) for the HMA is 272 wild horses. Therefore, to fully implement the LUP decision to attain AML's, 549 wild horses need to be removed.

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

Population Data

HMA Name	Appropriate Management Level (AML) Horses/Burros	1988 Estimated Population ^{1/} Horses/Burros	Proposed Number to be Removed Horses/Burros
Buffalo Hills	272/0	821/0	549/0

^{1/} Population estimate based upon an aerial census conducted in August of 1983.

A pre-removal census will be conducted in July of 1988 using a B-1 helicopter.

C. Activity Plans

A draft Herd Management Area Plan (HMAP) will be initiated in 1988. The HMAP will be finalized in 1989.

A Habitat Management Plan (HMP) which covers the entire HMA was approved in 1978. The HMP is currently being revised to meet HMP standards.

An Allotment Management (AMP) that encompasses all of the HMAP was approved in 1988.

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 (Management Framework Plan - Step III) has recently been developed for the Sonoma-Gerlach RA. 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 Management Framework Plan (MFP) Step III Decisions on June

30, 1982. The decisions 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.

None of the above five conditions are applicable to this proposed plan of removal, and the existing/current numbers (as of July - 1988) will be used as a starting point for monitoring purposes.

IV. Removal Plan and Methods

The excess wild horses 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. Experience gained from past removals in this HMA indicate the proposed action may cause undue stress to the animals. It is difficult to remove animals from this HMA 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 have to travel further before they are captured.
3. A very steep escarpment exists along the southwest, south and southeast sides of the HMA. This geologic feature limits areas where animals can be brought into the trap.
4. Very few roads available for trap locations and transportation purposes.
5. The entire HMA is within a Wilderness Study Area (WSA) boundary. A WSA restricts the location of trap sites and 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 horses 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 horses are in the trap the gate will be closed by hand. Should a horse 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 three temporary trap and corral sites (see map) will be required to remove the 549

excess wild horses. Additional temporary trap sites may be necessary if the animals disperse from their home ranges once removal operations start. The removal operations will start on the west side of the HMA, then continue on the south side, and finish on the east side. All temporary trap locations will be selected by the COR.

3. All trap locations 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.
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 map labeled for a delineation of the WSA boundary.

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

Richard D. Wheeler, Wild Horse and Burro
Specialist

4/20/88
Date

Gerald L. Moritz, Environmental Coordinator

Date

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

Date

Submitted to State Director by:

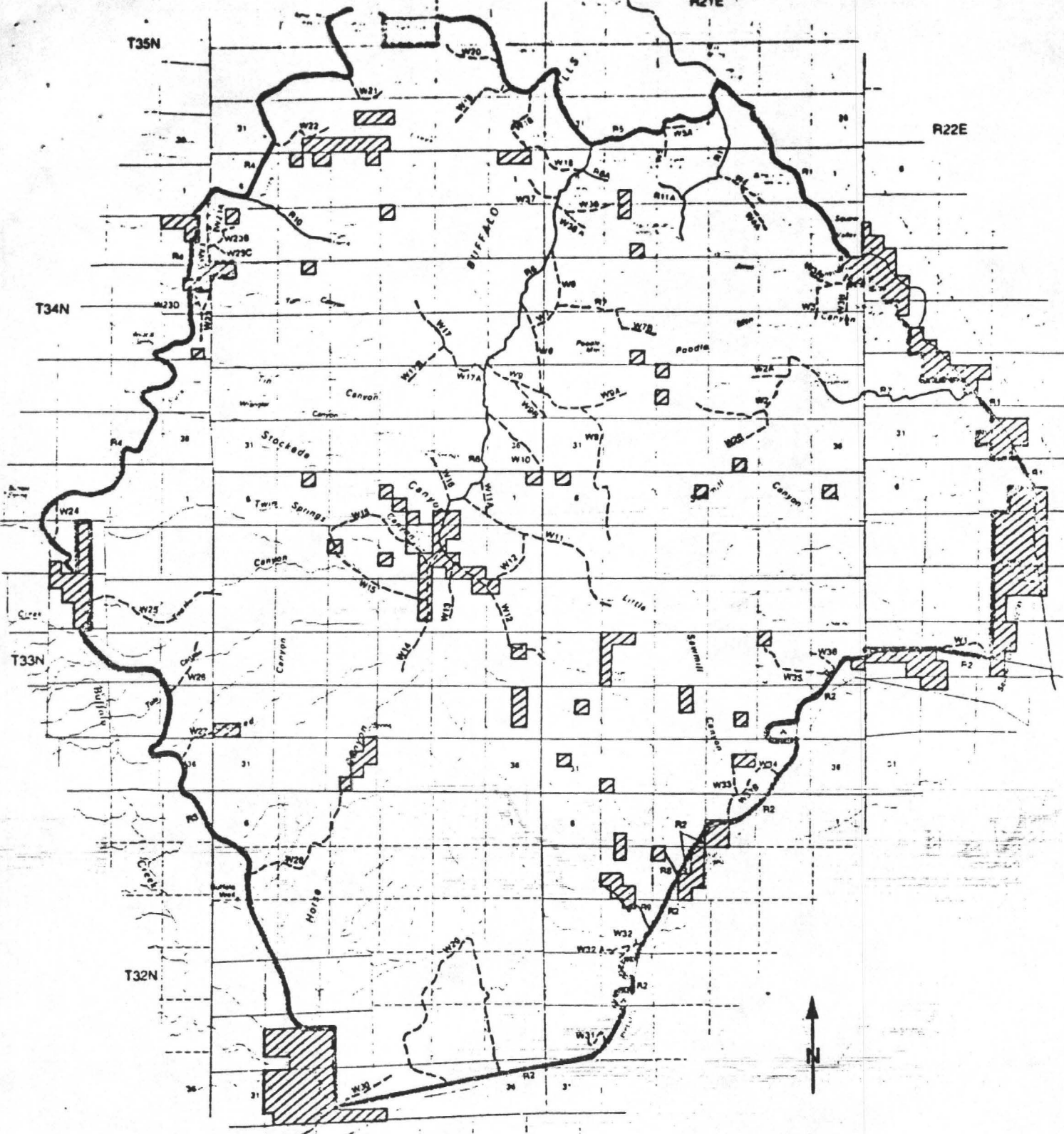
Robert J. Neary
Acting District Manager, Winnemucca







Date

Approved by:

Edward F. Spang
State Director, Nevada

Date

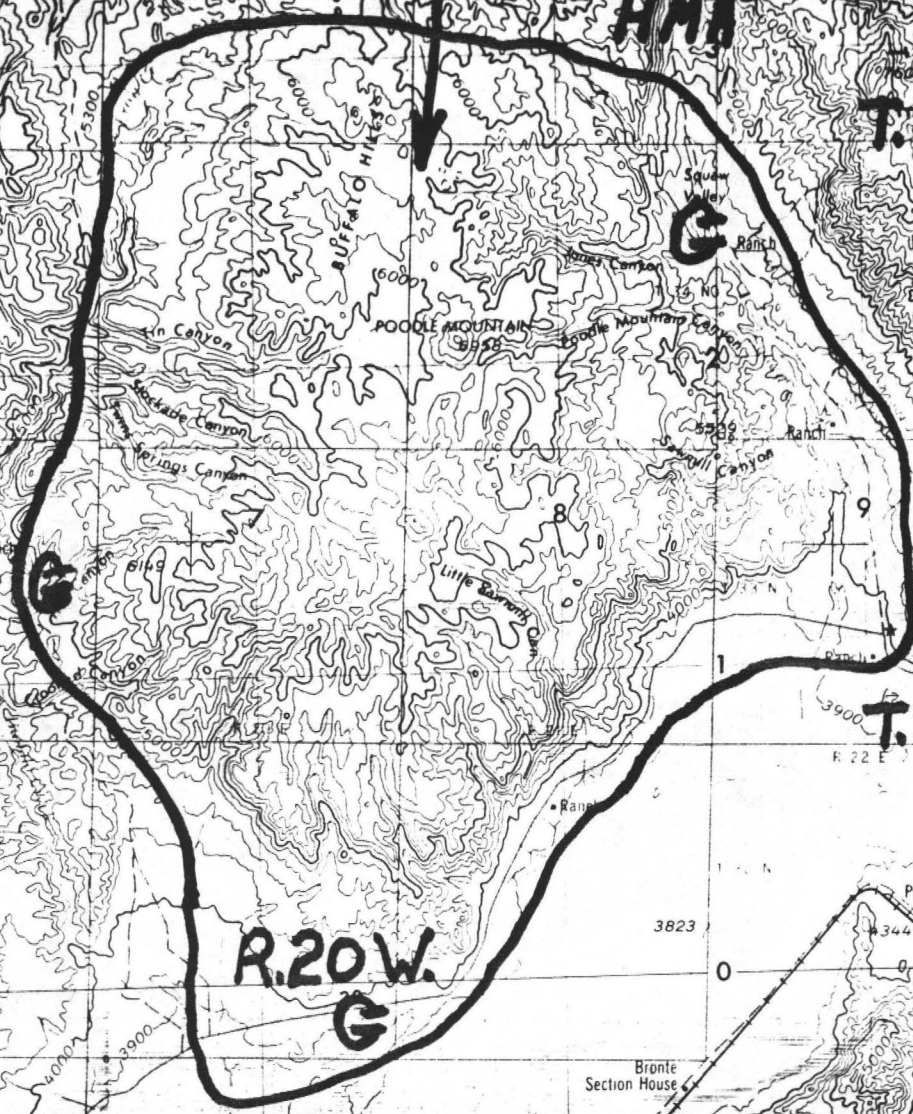


-  PRIVATE LAND (SURFACE & MINERALS)
-  PRIVATE SURFACE (PUBLIC MINERALS)
-  W. S. A. BOUNDARY
-  ROAD
-  WAY
-  GRAVEL PIT



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

Buffalo Hills HMA



T.35N.

T.33N

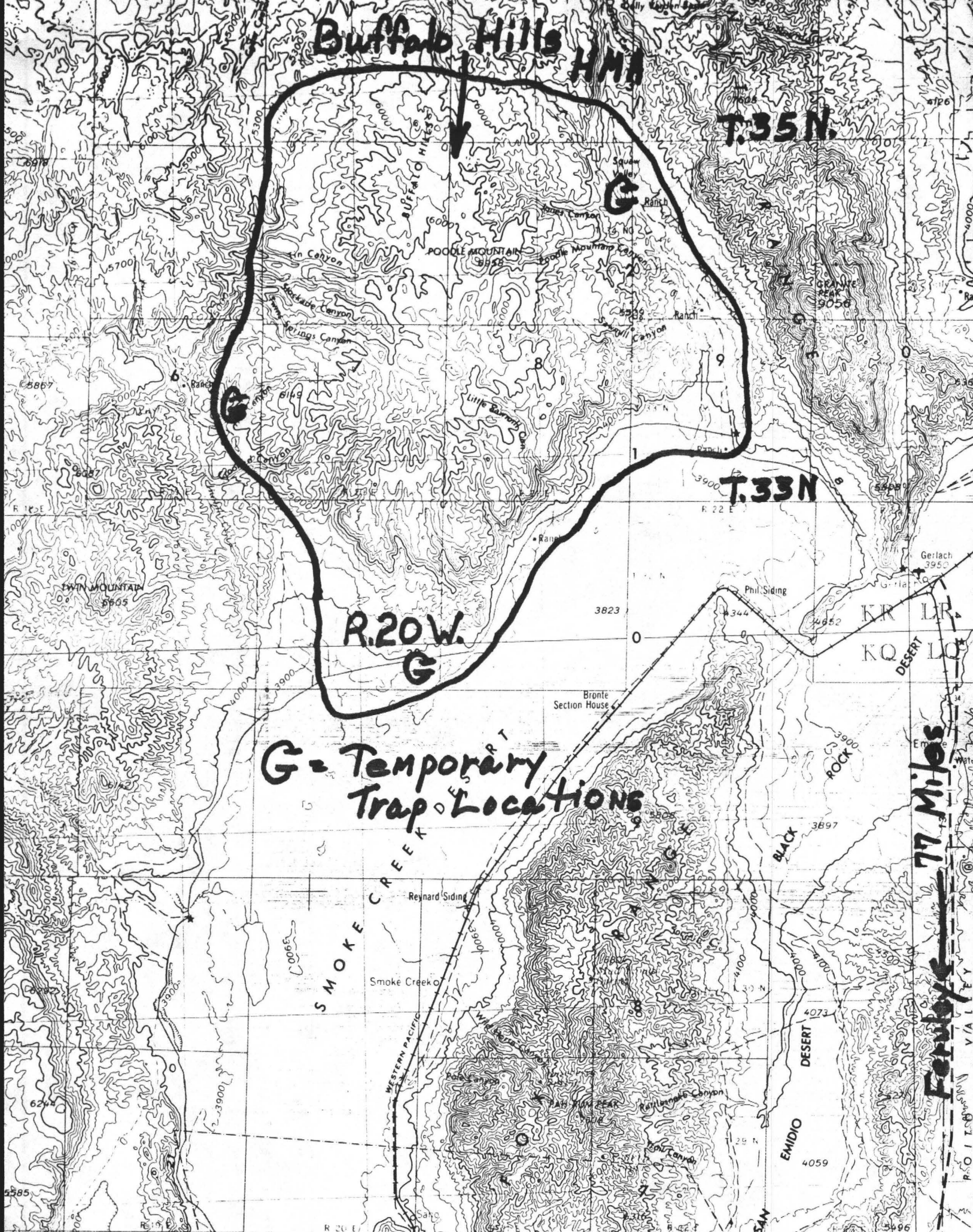
R.20W.
G

G = Temporary
Trap Locations

77 Miles

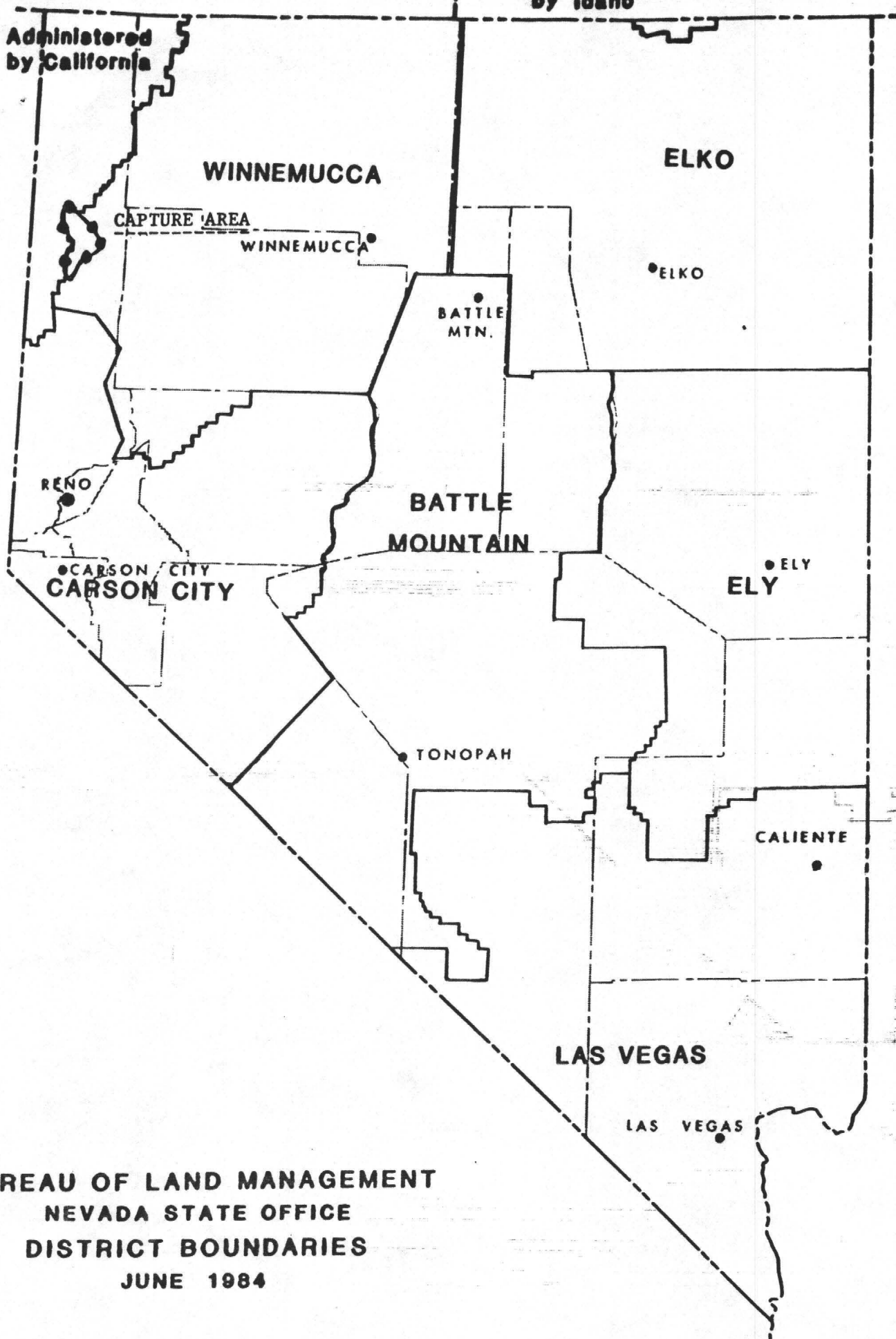
Ferby's

FOOTMOUNTAIN VALLEY



Administered
by California

Administered
by Idaho



BUREAU OF LAND MANAGEMENT
NEVADA STATE OFFICE
DISTRICT BOUNDARIES
JUNE 1984