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United States Department of the Interior

IN REPLY REFER TO

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(N-931.3)

BUREAU OF LAND MANAGEMENT

Nevada State Office
300 Booth Street
P.O. Box 12000
Reno, Nevada 89520

JAN 27 1981

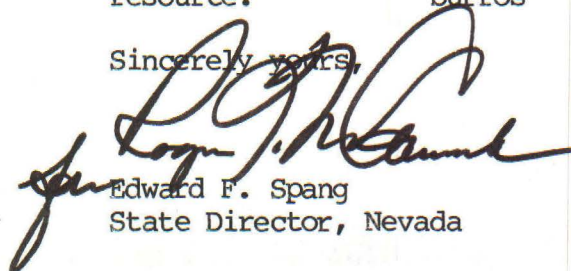
Wild Horse Organized Assistance
P.O. Box 555
Reno, Nevada 89505

Gentlemen:

The Bureau of Land Management proposes to gather excess wild horses and burros from public lands in Nevada no sooner than 28 days from the date of this letter. The proposed gatherings will be conducted in the Winnemucca District in the area shown on the attached map and as described below:

Area Name	Environmental Analysis Record Number	Reason for Gathering	Number to be Removed	Approximate Number to Remain
Lava Beds/ Seven Troughs	NV-020-0-38	Reduce over utilization of the forage resource.	864 horses 14 burros	413 horses 115 burros

Sincerely yours,



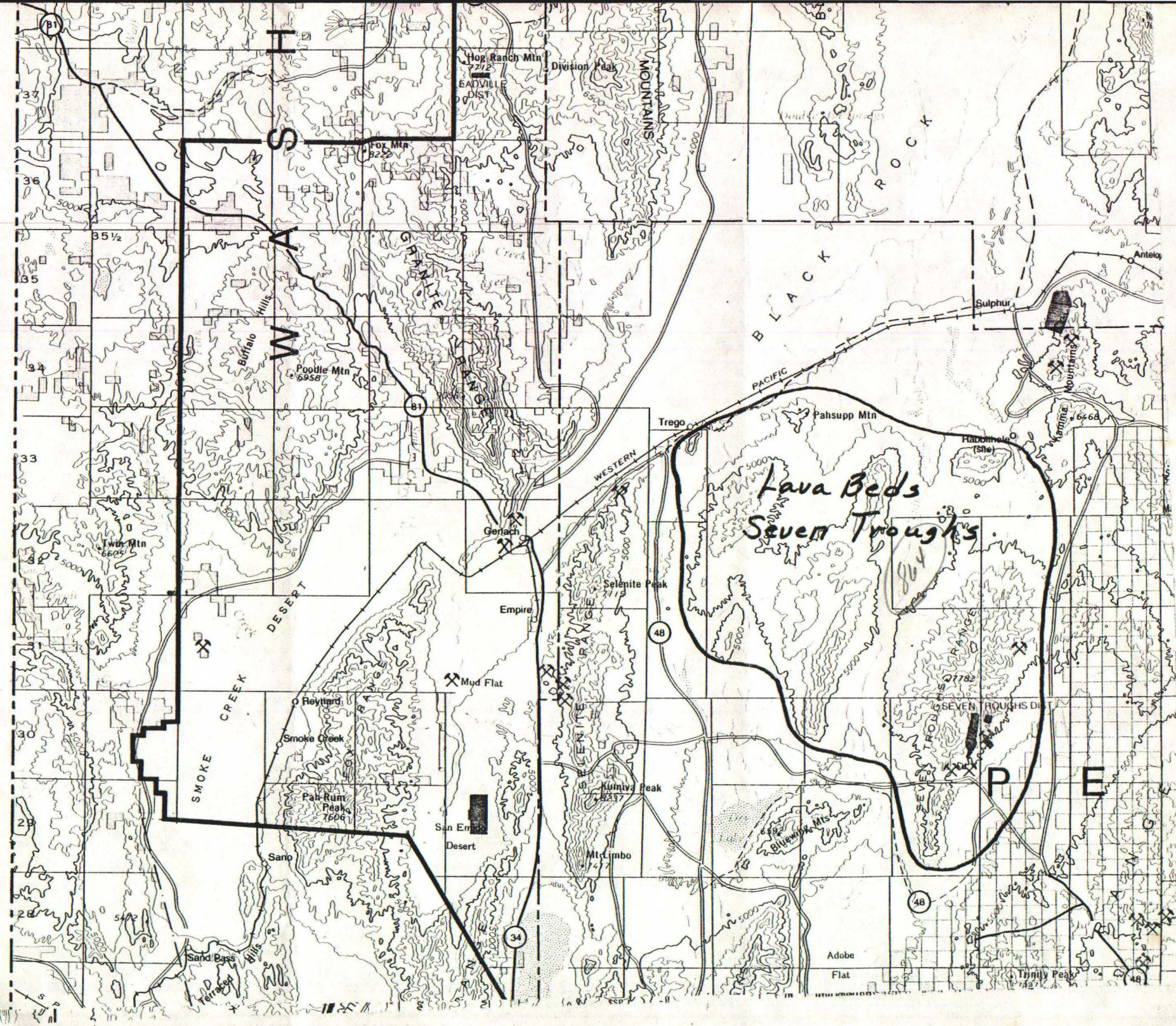
Edward F. Spang
State Director, Nevada

Enclosure
Map

cc:
N-020 w/map
N-030 w/map

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February 9, 1981

Robert J. Neary, Acting District Manager
Bureau of Land Management
Department of the Interior
705 East Fourth Street
Winnemucca, Nevada 89445

Dear Mr. Neary:

Ed promised in conversations with Mr. BraddHines and Mr. Roger Bryant pertaining to the Sonoma-Gerlach/ Lava Beds-Seven Troughs twenty-eight day notification; previous comments on Sonoma-Gerlach attached. Please forgive the bad copies as they have been made off a carbon, typo errors and all.

Although WHOA! received the formal 28 day notice of horse removal from Lava Beds/Seven Troughs area we have reviewed no capture plan, no EA of the Seven Troughs, and no copies of the agreements as discussed in the meeting of June 1980, i.e. the permittees.

We object strongly for the addition of Seven Troughs for which we have had no opportunity to comment or review. We obviously would be remiss in our responsibility if we allowed the Bureau to capture animals without that review of capture plans, boundaries, specific area reductions, and contingency plans. We will take this opportunity to provide some comments that perhaps will generate some response at the February 18th meeting in Reno.

1. Mares are extremely heavy with foal as was evidenced by the slippage and abortion in the previous gathering just completed, the Clan-Alpine.
2. The animals are generally in poor condition coming from alleged depleted resource and winter.
3. No exact capture boundaries are known to us; no assurances made that will dictate who will determine what horses to be removed and from where. The District admits that largely animals will be removed at the discretion of the capture crew, none of which has been trained in population dynamics or the management of wild lifes.

Lava Beds-Seven Troughs

4. No assessment of impact on the Seven Troughs populations and no data substantiating the migration of animals from Lava Beds to Seven Troughs.
5. No substantiation that removal from a vegetative standpoint is necessary in the Seven Troughs with the exception of the quota determined in the Lava Beds.
6. No written assurances referred to in the June 1980 meeting with cattle and sheep representatives that agreements have been signed stating there will be no increase in livestock or that wild horses would share in a proportionate increase in forage if the resource responded.
7. Nor was it known to us at the time of the June 1980 meeting that C-Finch had filed litigation seeking complete removal of horses from his private lands as well as those he leases from Southern Pacific. Hence his 84% reduction is understandably an attempt to prejudice support for even more removal off those adjoining public lands.

If the District, as stated recently, wants to manage the resource solely for its own good, and not as the court dictates; then this proposal contradicts that statement. The approximate number of wild horses to remain is a pittance in comparison to the continued reign of livestock and the fact that the District recommendation is for complete removal from their historical habitat in other areas of the unit.

We are hopeful the District will review the Lava Bed-Seven Troughs proposal and that some satisfactory resolution can be brought forth; however, although we are notified as a courtesy on the 28 day notice, we feel no obligation to adhere to that time frame. It is our contention the Bureau will violate PL 92-195, regulations and policy, i.e., Inst. Memo 81-145, enclosure 1-7 (c), (d), (e).

Most sincerely,

Dawn Y. Lappin (Mrs.)
Director

DYL/rl

cc: Board of Trustees
Rose Strickland-Sierra Club
Craig Downer-API
Dennis White-American Humane Association
Mr. Spang, State Director-BLM
Mr. Milt Frei-State Wild Horse Specialist