



7/6/94

**COMMISSION FOR THE
PRESERVATION OF WILD HORSES**

255 W. Moana Lane
Suite 207A
Reno, Nevada 89509
(702) 688-2626

July 6, 1994

Robert J. Neary, Acting District Manager
BLM-Winnemucca District Office
705 East 4th Street
Winnemucca, Nevada 89445

Subject: Draft Animal Damage Control Environmental Assessment

Dear Mr. Neary,

Thank you for the opportunity to review and comment on the draft ADC EA for the Winnemucca District. The Commission supports the fact that the Bureau is evaluating alternatives other than wantonly killing predators; therefore we are supporting B.3, Alternative #2.

Predators are important in the context of population controls, as demonstrated in the Montgomery Pass Wild Horse Herd out of Bishop, California. The natural predator influences not only population controls, but elimination of weaker animals, and herd movement.

PL92-195, the Wild Free Roaming Horse and Burro Act of 1971, specifically states "[they] will be considered as an integral part of the natural system;" the predators are part of that natural system.

Our concern has primarily centered on ADC and aerial gunning within HMA's, and specifically during the foaling season. Current BLM policy dictates that no "low-level" flights occur during the Districts foaling period. That any flights during this period are limited to emergencies or distribution flights, which in the latter case would be higher elevation flights. We have also experienced aerial gunning from a fixed wing during a capture operation.

The Commission recommends:

- 1) the previous operator must show significant efforts on their part; i.e., guard dogs, burros, lambing sheds, etc., before lethal controls are used.

Robert J. Neary, Acting District Manager
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2) that a significant number of animals have been affected by predators, after the permittee has exhausted all non-lethal efforts, prior to the authorization of lethal controls.

3) that low level flights by "anyone" during the foaling period in an HMA, be prohibited.

4) notification to the State of Nevada Commission for the Preservation of Wild Horses on requests for ADC activity in an HMA.

5) be coordinated with the cyclical nature of rabbits and rodents. While the permittee may lose a few sheep to coyotes, he may lose more sheep for the loss of AUM's in a high rabbit population.

As a suggestion to the permittee, there has been much documentation on the fact that burros make excellent "guard" animals when cohabitating with sheep. With the forthcoming gathers proposed by BLM, the Forest Service, and the Lake Mead National Recreation Area there will be an extensive selection of burros available for adoption.

Again, we commend your District for suggesting and mandating that all non-lethal approaches be exhausted prior to lethal methods.

Sincerely,

CATHERINE BARCOMB
Executive Director

W H O A

WILD HORSE ORGANIZED ASSISTANCE
P.O. BOX 555
RENO, NEVADA 89504

6/6/94



... a note from

Dawn Y. Lappin

July 6, 1994

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BLM-Winnemucca District Office
705 East 4th Street
Winnemucca, Nevada 89445

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Kenneth G. Walker, District Manager
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DAWN Y. LAPPIN
Director