

G 9/28/82

W H O A !

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In Memoriam

**WILD HORSE ORGANIZED ASSISTANCE
INC.**
A Foundation for the Welfare of
Wild Free-Roaming Horses and Burros

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Reno, Nevada 89504
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September 28, 1982

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

Mr. Frank Shields, District Manager
Bureau of Land Management
705 East Fourth Street
Winnemucca, Nevada 89445

Re: Seven Troughs

Dear Mr. Shields:

As promised, a note of WHOA's reasoning for opposition to the Seven Troughs interim reduction of wild horses.

First, I am not a member of the CRMP group, so could not vote yea or nay on the signed agreement.

Second, I believe the Seven Troughs minimally deserves an EAR, not a paragraphical extension to the Lava Beds. It is not clear to us whether the animals are crossing into the Seven Troughs because of over population, poor range conditions, or whether it may just be a natural migration. I believe an analysis of this set of circumstances have merit.

Thirdly, I strongly objected to the wording of the signed 'agreement' wording by the CRMP in 2A. Although I expressed my concern in this regard, no attempt was made or negotiated to alter that language. As expressed in my meeting with Mr. Spang about the imminent capture, this roundup deserves an EA on its own merits and anything less is not in compliance with NEPA.

W H O A can see! The soil and vegetative resources are being severely impacted, what is not clear are the causes. If it is as severe as stated, and if the resources cannot support the current populations, then removal of just 200 is superficial and temporary at best.

Should the group decide to amend the wording in Section 2A of the agreement and analyze the impacts of the proposal to the range and the remaining animals, then we could support the interim reduction. But without some written assurance that livestock will not return to the pre-agreement levels after the 82-83 season, we cannot support the agreement. If the permittees would be willing to assure in writing that increases will not sought until such time as the CRMP or monitoring recommend stocking levels--then the assurances we need to negotiate the interim would be in place.



We do not consider our request to be unreasonable by any stretch of the imagination. Furthermore communication with Watt/List and later policy developed by Spang (see Paradise-Denio EIS Decision Document) support current numbers unless one of five conditions are met, one of which is, some consensus in CRMP on management.

WFOA is not trying to disrupt or interfere with management of the rangeland resources, so long as laws, regulations, policies and SOP's are complied with. We believe that Seven Troughs proposal has circumvented this orderly manner.

The minutes to the CRMP meeting discussed the 1:1 ratio of manipulation of the wild horses in management, but that conversation was never fully completed, as a 1:1 ratio is not manipulation but reflects approximately what the ratio of horses is now. By manipulation, I meant to adjust the population favoring age and sex so as to pre-determine a rate of increase for the future, and having some idea about the management monies that would be necessary. I will discuss these theories more thoroughly with Roger Bryan, or Paul Jancar when we meet to discuss herd management programs.

Most sincerely,

Dawn Y. Lappin (Mrs.)
Director

cc: Edward F. Spang, State Director
David R. Belding, Attorney-Board of Trustees