



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

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

7/6/92
TAKE
PRIDE IN
AMERICA

IN REPLY REFER TO:

4700
(NV-026.81)

Commission for the Preservation
of Wild Horses and Burros
Ms. Cathy Barcomb
Stewart Facility
5500 Snider Avenue
Carson City, NV 89710

Dear Ms. Barcomb:

I would like to take this opportunity to inform you of the current status of the C-Punch proposal for a Wild Horse and Burro Range in the Seven Trough and Bluewing Allotments. Enclosed, please find a copy of the minutes from our Lovelock meeting on June 18, 1992, The American Wild Horse Foundation's letter outlining their commitments, and our response to their letter.

A final decision will not be issued until the allotment evaluation for the Bluewing/Seven Troughs Allotment is completed. The wild horse and burro range proposal will be considered as an alternative in the draft evaluation.

I have also enclosed a tentative schedule for the allotment evaluations to be completed during the 93 and 94 fiscal years.

If you have any questions, please do not hesitate to contact Amanda McCutcheon, Wild Horse and Burro Specialist.

Sincerely yours,

Bud Cribley
Area Manager
Sonoma-Gerlach Resource Area

Enclosures

cc Phil Benolkin, NDOW
John DeLong, DeLong Ranches
Tim DeLong, Permittee
Pete Ernaut, AWHF
Ted Fitzpatrick, Catellus Management Corporation
Dawn Lappin, WHOA
Roy Leach, NDOW
Hugh Montrose, Mayor, City of Lovelock
Wendall Newman, Senator Reid's Office
Tom Pogacnik, BLM
Claudia Richards, HERDS
Rose Strickland, Sierra Club, Toiyabe Chapter
Karen Sussman, Internat'l Society for Protection of Mustangs and Burros
Nancy Whitaker, Animal Protection Institute of America

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
Winnemucca District Office
705 East Fourth Street
Winnemucca, Nevada 89445

In reply refer to:

4700 (NV-026.8)

JUL 06 1992

Memorandum

To: Sonoma-Gerlach Area Manager ^R

From: Tom Seley, ^{TS} Range Conservationist

Subject: C-Punch Wild Horse and Burro Range Proposal

On June 18, 1992 a meeting was held at the Lovelock Community Center to discuss the C-Punch Corporation proposal to create a Wild Horse and Burro Range within the Seven Troughs Allotment. The purpose of the meeting was to have C-Punch present their proposal to the other grazing permittee's and affected interests in the area, and to determine what concerns the permittee's and affected interests had with the proposal. The following individuals were present at the meeting:

<u>Name</u>	<u>Representing</u>
Roy Leach	NDOW
Cathy Barcomb	Nevada Commission for the Preservation of Wild Horses
Hugh Montrose	Mayor-City of Lovelock
Tim DeLong	Flying M Ranch
Brent Espil	Espil Sheep Company
John DeLong	DeLong Ranches
Hank Dufferena	Dufferena Sheep Company
Tim Dufferena	Dufferena Sheep Company
Buster Dufferena	Dufferena Sheep Company
Ted Fitzpatrick	Catellus Management Corporation
Pete Eranis	American Wild Horse Foundation
Myron Goldsworthy	interested public
Betty Irvin	C-Punch Ranch
Robert Irvin	C-Punch Ranch
Richard Irvin	C-Punch Ranch
Larry Irvin	C-Punch Ranch
Philip Benolkin	NDOW
Wendall Newman	Senator Reid
Bud Cribley	BLM
Amanda McCutcheon	BLM

Active Pref.
4404 AUM
in S/T allot.

Leigh Redick	BLM
Peggy Wiltse	BLM
Clarence Covert	BLM
Tom Seley	BLM

Bud opened the meeting by telling the group that C-Punch Corporation has made a proposal to create a wild horse and burro range within the Seven Troughs Allotment and asked the Irvins to explain their proposal to the group.

Richard and Robert Irvin discussed that C-Punch is proposing to create a non-profit foundation which would raise funds for the management of wild horses and burros in the Seven Troughs area. C-Punch is currently supporting the foundation and will put their 5400 AUM's of livestock preference and water rights into the foundation. The foundation would provide funding for fencing, water developments, and supplement BLM funding for removal of excess animals. They feel with foundation funding we can fence the boundary of the area and manage the wild horses and burros more effectively. Richard indicated that he thought Catellus Management Corp. (Sante Fe railroad lands) would support the proposal. He also mentioned that there is an opportunity for developing a visitor center and increased tourism in the Lovelock area if the range is established. Robert Irvin does not want this to be a dumping ground for unadoptable wild horses, and the Blue Wing area is not included in the proposal.

Larry Irvin said it is their intent for this to be an experimental range to further the management of wild horses, not a sanctuary. He recognized that wild horses and burros are there by law and that our past management efforts have not been effective. He feels that we can study various fertility control techniques and prove with proper management that multiple use works. This proposal is for an experimental range to conduct meaningful research on wild horse and burro populations.

Robert and Larry Irvin said they would put livestock back into Seven Troughs and ask for a western boundary fence if the wild horse range is not established.

Buster Dufferena was concerned about the proposed boundary fences. He said that horses are able to disperse now, but a boundary fence has the potential to hold and concentrate animals in the area. If we are unable to remove excess animals because of protests, his grazing preference could be reduced. He feels that the permittee's who would continue to use Seven Troughs may be impacted by the proposed range because an interest group may protest and stop animal removals at any time.

Robert Irvin said he thought Catellus would cooperate with the establishment of the Range, and agree to let wild horses and burros use the checkerboard lands in the southeast corner of the allotment. If necessary, C-Punch is willing to continue paying the railroad grazing lease for those lands. Ted Fitzpatrick said Catellus Management Corp. would cooperate in the establishment of the Range if it is workable.

Roy Leach stated, if the range is established there should be a complete removal of wild horses and burros, and then turn out a known number of animals so a population study can be developed. By starting with a known population

level we can determine recruitment and other population information. He feels we can also determine who made the use in specific areas (i.e. cattle, horses, wildlife). Collection of data for wild horses and burro populations should be very similar to collecting data for wildlife populations. He said we can't lose if we adequately study the area.

There was general agreement among the permittee's that there should be a known number of horses and burros in the area, and that they would prefer to start with a low number of animals and allow the population to grow. They are concerned about agreeing to the construction of fences at this time. Brent Espil asked what the minimum and maximum number of horses would be for the area. BLM will not have this figure available until the allotment re-evaluation is completed.

Bud told the group that BLM could initiate the same type of studies discussed today. He informed the group about our Strategic Plan for the Management of Wild Horses, and that we are implementing a fertility control study in Ely during FY-93. For a proposal on this scale, all affected interests must agree on the proposal.

It is absolutely necessary to complete the Blue Wing/Seven Troughs Allotment re-evaluation in order to proceed with the proposal because it will establish the carrying capacity for the area. If everyone agrees to the proposal it would be included in the re-evaluation as an alternative. If we proceed with the proposal, it may require a Land Use Plan Amendment.

Richard Irvin asked if the re-evaluation is a condition for moving ahead with the proposal. Bud stated that it is part of the process.

Roy Leach and the permittee's felt that the re-evaluation and multiple use decision would be a good starting point for the proposal.

Bud told the group that the best way to proceed is to complete the re-evaluation process through the multiple use decision, since this will address future management of the area. Once the multiple use decision is through the protest period, we will start implementing the management actions outlined in the multiple use decision.

Bud asked C-Punch to draft a formal proposal and submit it to BLM. Richard Irvin stated that they did not feel that they had enough knowledge of the laws and regulations to draft a proposal. They feel that the ball is in our court.

Bud informed C-Punch that the foundation and disposition of AUM's are critical to their proposal. BLM needs a written commitment from C-Punch outlining the disposition of their AUM's and a description outlining how the foundation will function. C-Punch agreed to send a proposal within two weeks. They are concerned that the AUM's stay together, either controlled by the foundation or C-Punch. They do not want the AUM's to be available to other livestock operators. Bud told the group that BLM has the ability to ensure the AUM's are not made available to other permittee's.

Everyone agreed that the proposal should be included as an alternative in the re-evaluation, and to proceed from there.

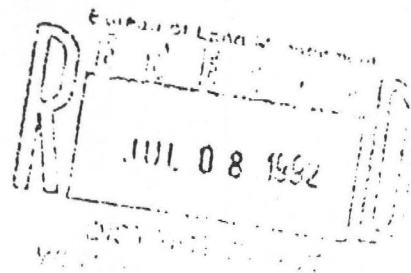
American Wild Horse Foundation
P.O. Box 665
Sparks, Nevada 89431



July 6, 1992

VIA REGISTERED MAIL

Bud C. Cribley, Area Manager
Sonoma-Gerlach Resource Area
United States Department of the Interior
Bureau of Land Management
Winnemucca District Office
705 East 4th Street
Winnemucca, NV 89445



RE: Proposed Wild Horse and Burro Range and Research Project For
The Seven Trough Range Allotment and a Portion of The Blue
Wing Range Allotment

Dear Mr. Cribley:

Consistent with the discussions at the meeting held in Lovelock, Nevada, on Thursday, June 18, 1992, the American Wild Horse Foundation (AWHF) herein sets forth its planned support of the above referenced proposal.

Subject to the Bureau of Land Management (BLM) developing and setting in motion implementation of a plan of horse and burro removal as well as a plan for horse and burro long term management in Seven Troughs and Blue Wing Range Allotments, the AWHF hereby commits to support the subject proposal as follows:

1. FENCING - It was agreed that the project could be a reality only if a fence on the west side were built separating the Blue Wing Allotment from the project range (specifically, the Seven Troughs Allotment and designated portions of the Blue Wing Allotment). It is the understanding of the AWHF that the BLM has a responsibility to supply the referenced fence, project or no project. The AWHF also understands that the BLM does not have adequate funding at this time to complete a fence on the west side as described. Therefore, the AWHF hereby commits to make up the shortfall in available funding so that a fence can be built. Estimated funding requirement is anticipated to be \$100,000 to \$300,000.

2. WATER DEVELOPMENT AND MAINTENANCE - At the meeting in Lovelock, it certainly appeared to be an agreed fact that the horses and burros can be extremely destructive where water resources are concerned. There also appeared to be a consensus with regard to the fact that such destructiveness is detrimental to the survival of the horses and burros as well as wild life native to the range and domestic animals sharing the range. Therefore, the AWHF hereby commits to fund water development including necessary pipelines. Estimated funding requirement is anticipated to be a one-time expense of between \$25,000 - \$50,000. Additionally, the AWHF hereby commits to assist the funding of water maintenance for a period of 20 years. The estimated annual funding requirement is approximately \$20,000.

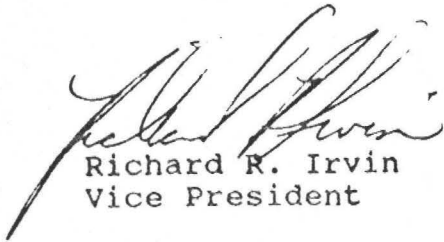
3. DOMESTIC ANIMAL RELIEF - It was apparent at the meeting that the representatives of the State of Nevada Wildlife were very much in favor of this project. Equally clear was that Nevada Wildlife was of the opinion that reducing the horse and burro herd to an agreed number was critical if meaningful data was going to be developed. Nevada Wildlife also was of the opinion that a successful project would require that the range receive relief from domestic utilization as well as from over-population by horses and burros. Therefore, the AWHF hereby commits to acquire all C-Punch Ranch AUM's and/or the removal of all C-Punch livestock from the project range for the life of the project, a period estimated to be not less than 20 years. Further, the AWHF believes this approach should be received favorably by other wild horse groups on an equity basis due to the necessary removal of horses.

In addition to its commitment to the above referenced project, the AWHF has committed itself to assist the BLM if requested with funding for horse and burro relocation, water and feed development on ranges other than the project range, and to the development of a visitor and science center in association with the BLM and Nevada Wildlife in conjunction with the project range. Based on the preceding, we look forward to the earliest possible completion of an evaluation and plan for the Seven Troughs and Blue Wing Range Allotments by the BLM and by the BLM in association with Nevada Wildlife Management.

Bud C. Cribley
July 6, 1992
Page 3

Sincerely,

AMERICAN WILD HORSE FOUNDATION



Richard R. Irvin
Vice President

RRI:kh

cc: Billy Templeton, State Director, BLM, Reno, NV
Wendell Newman, Regional Manager, Senator Reid's Office,
Reno, NV
Roy Leach, Region I Habitat Assistant, Fallon, NV
John Paul Laxalt, Special Assistant to Director, BLM,
Washington, DC
Pete Ernaut, McGuire/Ernaut, Reno, NV

AUG 27 1992

TS
4700
(NV-026.8)

American Wild Horse Foundation
Attn: Richard R. Irvin
P.O. Box 665
Sparks, Nevada 89431

Dear Mr Irvin:

After reviewing your letter dated June 6, 1992 which discusses the American Wild Horse Foundations (AWHF) commitments to the proposed Wild Horse and Burro Range in the Seven Troughs Allotment we need to further clarify the disposition of Aum's that AWHF plans to acquire from the C-Punch Ranch.

To transfer grazing preference, the Code of Federal Regulations (CFR) 4110.2-3 (a)(1) requires the transferee to meet all necessary qualifications for a grazing preference. To qualify for grazing use on the public lands the Code of Federal Regulations under Mandatory qualifications 4110.1 states, an applicant must be engaged in the livestock business and must own or control land or water base property. Since the AWHF is not engaged in the livestock business and does not own or control base property it is not possible to transfer the C-Punch grazing preference to AWHF. The best way to ensure that these Aum's are not made available to other users in the area would be to relinquish the Aum's back to the Bureau to be used solely by wild horses and burros.

As I told everyone in our June 18, 1992 meeting, the proposed Wild Horse and Burro Range will be one of the management alternatives in the Blue Wing/Seven Troughs Allotment re-evaluation. The allotment re-evaluation will also establish the carrying capacity for the allotment, outlining the number of livestock, wild horses and burros that we will manage for in the area. One area of apparent misunderstanding is the proposed fencing of the west side of the allotment. The BLM is not obligated to construct a fence along the western boundary of the Seven Troughs Allotment regardless of the outcome of the project. The fence may be constructed if it is determined through the allotment re-evaluation to be necessary to promote multiple use management of the area.

The AWHF's commitment to fund part of the proposed western boundary fence and to develop/maintain water sources is appreciated, however, until the allotment re-evaluation and multiple use decision is final we cannot commit to any specific management action(s).

Sincerely yours,

BUD C. CRIBLEY

Bud C. Cribley, Area Manager
Sonoma-Geolach Resource Area

TS

6-18-92

6-18-92 MEETING W/BLM/IRVINS/RANCHERS
"EXPERIMENTAL RANGE"

LARRY, RICHARD, MR + MRS. IRVIN, BUSTER DUFFERENA ++, WENDELL,
CRIBLEY, SEELYE, ESPELL, PETE EENAUT

RICHARD THIS AREA WOULD PROVIDE FOR A STUDY AREA TO DETERMINE A
BETTER MGT APPROACH FOR WH HERDS, THIS COULD BE
DONE IN OTHER ALLOTMENTS, USE FERTILITY CONTROL
THEY HAVE REID, BRYAN, VULCANOVICH SUPPORT

DAD WH'S overrun ranges where ranchers aren't present to force mgt.

IRVINS WILL DONATE 5400 AUM'S TO WH FOUNDATION
" " " water rights " " "

A FENCE IS PROPOSED TO RUN DOWN WEST SIDE OF SEVEN TROUGHTS
TO SEPARATE FROM BLUE WING, \$70-\$90,000 FOR FENCE

* WHF WILL PROVIDE \$ FOR FENCING AND FOR ROUNDUPS

* WILD HORSE RANGE (RESEARCH AREA)
FERTILITY PROJECT HERE - STUDY COSTS, RESEARCH, TOTAL FOR
MAINTAINING "THESE TYPE RANCHES"

LARRY IRVINS ARE HAULING H₂O NOW, FEDERAL DOMESTIC RANGE STOCK
REID WAS LOOKING FOR SOMETHING LIKE THIS (500 sq m. PETRI DISH)

CRIBLEY ALLOTMENT EVALUATION
RE-EVALUATION SCHEDULED FOR MID-SEPTEMBER

MAY ADJUST EAST BOUNDARY SEVEN TROUGHTS TO EXCLUDE CHECKERBOARD
CENSUS PLANNED FOR JULY

BUSTER IS SUGGESTING GIVING HIM ANOTHER AREA TO GRAZE
AS A TRADEOFF

LUP AMENDMENT NEEDED?

GET BLUE WING/SEVEN TROUGHTS HMAP

When the BLM states h's get 8% of HMA... (ask why) ...
in LUP! Look at MFP, doesn't say that it states
T + E balance, etc., etc.

pg 2 HMAP 3-5-8 monitoring
(1992)

* FIND OUT PAST REMOVAL DATA ON PAIOTE #'S OF HORSES REMOVED?
AGE STRUCTURE? LEFT OUT?

Fertility Study?

Get BLUE WING / SEVEN TROUGHTS HMAP

When the BLM states horses get 8% of HMA ask why, well in LUP look at MRP, doesn't say that it states thriving ecol. balance, etc, etc.

(lower pg 2)

SEVEN TROUGHTS / BLUE WING HMAP
3-5-8 year monitoring
1992

find out past removal data on Paints #s of horses removed age structure? left out.

WENDELL, ^{BUSTER} DUFFARONA, ESPELL

HARRY, RICHARD IRWIN

PETE ERNAUT

(p. 1116) unanimously passed both houses of Congress

study horses, determine better mgmt approach, maybe

do this in other areas

REID, BRYAN, VUCANOVICH - support

JAN IRVIN

horses overrun ranges where ranchers aren't present to force mgmt.

5400 AUM to put into WTHF

water rights assigned to "

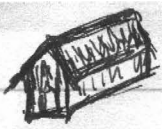
need fence down west of seven troughs to separate Blue Wing

★ study = costs, research, total for maintaining "these ranges"

(LARRY) - fence domestic animals (turned loose ranch stock)

IRVINS ARE handling WATER now, horses ARE getting those WATERS

IRVINS
WILL DONATE
THEIR



4

fence entire job range

re-evaluation mid september for Seven Troughs - CRIBLEX

MAY ADJUST EAST BOUNDARY OF " " to exclude checkerboard ~~Block~~

IRUM - WHF will have \$ for removals of BUM horses as necessary
WHF will provide \$ for fencing + WATER DEVELOPMENTS
70-90,000 for

BUSTER SUGGESTION GIVING HIM OTHER AREA
TO TRADE AND GET HIM OUT OF THE

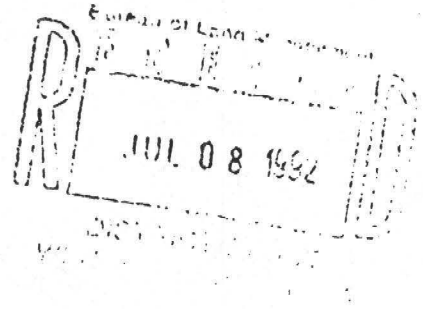
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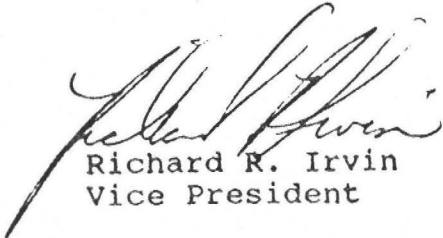
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Vice President

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Sincerely yours,

BUD C. CRIBLEY

Bud C. Cribley, Area Manager
Sonoma-Geilach Resource Area

TS

MEETING W/ IRVIN'S ON SANCTUARY 2/25/92

SEVEN TROUGHTS ALLOTMENT

WILD HORSE PARK

IRVIN

They don't want this to be a dumping ground for "unadoptables"
Economically viable ranch castrated dead heats

500,000 acres to horses

wh advocates want horses unlimited/horses destroying habitat for others

1,000 out there now, he feels ^{ranch} can handle double

satellite facility from BLM center

tourist value - see horses in natural state

hunting value w/ improved waters

(Reid - laboratory for mtg.)

Billy - putting horses where they weren't in 1971

public benefit

recreation or interpretation benefit

- GOVERNOR'S OFFICE WILL NOT BE A PROBLEM

IRVIN - control 50% of AUM'S in Seven TROUGHTS

wants RMP for seven troughs w/horses

need BLM COOPERATION since horses belong to BLM

Current RMP won't allow for this project

877 horses 133 burros - CRMP 1972 pop level

1,020 between 6 HMA's

TOM

July 1

1506 horses 206 burros in all 6 HMA'S

3 other permittees + railroad

Guarantee
Irvin
will fund
in early
years