



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)

May 28, 1987

*Complete wk of June 22nd*

Commission for the Preservation  
of Wild Horses  
c/o Terri Jay, Executive Director  
625 Fairview, Suite 111  
Carson City, NV 89701

Dear Mr. Jay:

Enclosed is a copy of a draft Environmental Assessment (EA) for your review.

If you wish to comment on the draft proposal, please submit your comments to our office no later than June 30, 1987.

If you have specific questions concerning the draft EA, feel free to contact Dick Wheeler of this office.

Sincerely yours,

Frank C. Shields  
District Manager

Enclosure

*Mon. 29<sup>th</sup> 2 AM*



Winnemucca District Wild Horse/Burro Removal  
Programmatic Environmental Assessment (EA)

No. NV-020-7-

I. Description of the Proposed Action

A. Background Data

1. Location

This programmatic EA covers the entire Winnemucca District, and addresses all (see Section D, Population Data) of those wild horse and burro Herd Areas (HA) where excess wild horses and burros would be removed at some future date as funds permit. Refer to Attachment 2 for location of HAs.

B. Purpose and Need

The purpose and need of this programmatic EA is to determine and analyze the various methods of removing excess wild horses and burros from twenty-five individual Herd Areas. Future removals of excess wild horses and burros would not require the preparation and approval of a new EA, but would require approval of Removal (Gathering) Plans.

C. Relationship to Land Use Plan (MFP-III) and Coordinated Resource Management Planning Decisions

The Sonoma-Gerlach Land Use Plan (LUP) was approved on July 9, 1982. The Paradise-Denio LUP was approved on June 30, 1982. The CRMP plans applicable to this EA are the Bullhead, Little Owyhee, and the Blue Wing-Seven Troughs plans. The Bullhead plan was approved on July 23, 1982, the Little Owyhee plan on February 12, 1982 and the Blue Wing-Seven Troughs plan on July 24, 1984.

These approved documents established Appropriate Management Levels (AML) and HA boundary delineations for all the HAs within the district. Refer to Appendix 1 for applicable portions of these decision documents.

D. Population Data

<u>Herd Area Name</u>	<u>1987 Estimated Population Horses/Burros</u>	<u>AML Horses/Burros</u>	<u>Number to be Removed Horses/Burros</u>
Antelope Range	422/4	0/0	422/4
Black Rock Range East	585/0	59/0	526/0
Black Rock Range West	611/0	424/0	187/0
Blue Wing Mtns.	78/48	50/39	28/9
Buffalo Hills	740/0	272/0	468/0
Calico Mtns.	905/0	514/0	391/0

Eugene Mtns.	30/0	0/0	30/0	
Fox and Lake Range	548/0	434/1	114/0	
Granite Range	411/0	176/0	235/0	
Jackson Mtns.	245/0	215/0	30/0	
Kamma Mtns.	67/1	50/0	17/1	
Lava Beds	1,566/20	375/40	1,191/0	
Little Owyhee Desert	291/0	200/0	91/0	<u>1/</u>
McGee Mtn.	0/0	0/41	0/0	
Nightingale Mtns.	258/0	87/0	171/0	
North Stillwater	170/0	82/0	88/0	
Selenite Range	36/1	0/0	36/1	
Seven Troughs	98/101	215/64	0/37	
Shawave Mtns.	268/0	100/0	168/0	
Snowstorm Mtns.	109/0	50/0	59/0	<u>1/</u>
Tobin Range	5/0	19/0	0/0	
Trinity Range	29/0	0/0	29/0	
Truckee Range	122/0	0/0	122/0	
Warm Springs Canyon	666/16	294/10	372/6	
East Range	20/0	0/0	20/0	
	<u>8,280/191</u>	<u>3,616/195</u>	<u>4,795/0</u>	

1/ AML will be obtained in this HA in 1987 by an approved EA and removal contract administered by the Elko BLM District.

#### E. Proposed Action

The proposed action is to continue implementing the Land Use (MFP-III) Planning and CRMP decisions by removing excess wild horses and burros until AMLs have been reached for all HAs. The removal operations would be a yearly process.

The removal of excess wild horses and burros would be accomplished by the use of a helicopter. The helicopter would locate the bands of wild horses/burros and drive them into temporary traps with the aid of mounted riders, when necessary.

The number of temporary trap and corral sites would vary for each HA, depending upon concentration and location of the animals. The site locations would be mutually selected by the contractor and BLM personnel. The trap and corral facilities would be constructed of portable panels. These facilities would be moved to different locations during the removal operations, and would be completely removed from the area after the contract has been completed.

Because of the movement of the animals, site specific locations of the traps and corrals cannot be pre-determined before the removals begin, therefore the specific locations would be determined on a case-by-case basis.

#### F. Alternatives

The three alternatives are (1) water trapping, (2) no action, and (3) removal of animals by mounted riders.

1. The removal of wild horses and burros by water trapping involves placing temporary corrals with one way gates at water sources.

Although this method is economical and has been proven successful in other locales, there are too many sources of water in the Winnemucca District for this method to be feasible. For this reason, this alternative will no longer be considered.

2. The no action alternative is not a realistic alternative. By law and policy, the BLM has been directed to remove excess wild horses and burros. A no action alternative would not remove any wild horses or burros and therefore, this alternative is not considered further.

3. The removal of wild horses and burros by mounted riders as an alternative has been considered. This method involves people on horse back locating the animals, and trying to drive the wild animals into the portable trap.

Although it is possible to gather wild animals by this method, this alternative is dropped from further consideration because it is less effective in gathering animals than a helicopter, takes longer and is not cost effective, and is far more dangerous to animals and humans than the use of helicopter.

## II. Description of the Existing Environment

### A. Physical Resources

The physical resources (soil, water, air, topography, vegetation, wildlife, climate, etc) of all the HAs are similar to each other, and are typical of the Northern Desert Biome. A detailed and comprehensive analysis of all resources that occur in the Winnemucca District is located in the Sonoma-Gerlach and Paradise-Denio Unit Resource Analysis, and in the Sonoma-Gerlach and Paradise-Denio Environment Impact Statement documents. These documents are primary BLM data sources, and were used in the development of the Land Use Plan (MFP-III) decision making documents.

The use of helicopters in gathering excess wild horses and burros has been an accepted method in the Winnemucca District since 1977. Any impacts to the above resources that may occur by continuing to use a helicopter can be mitigated by standard operating procedures.

### B. Wilderness Study Areas (WSAs)

There are thirteen WSAs that could be affected by the proposed action (see Attachment No. 1).

The use of aircraft for removing wild horses and burros from WSAs is consistent with the Interim Management Policy (IMP) and guidelines for public lands under wilderness review.



C. Visual Resources Management

Visual resources would ~~not~~ be affected by the proposed action since all structures are temporary.

D. Cultural Resources

Any impacts that might occur to cultural resources would be mitigated prior to removal operations.

E. Threatened and Endangered Species

The impacts that may occur to any identified threatened and endangered species would be mitigated prior to removal operations.

F. Floodplains, Wetlands and Areas of Critical Environmental Concern (ACEC)

There have been no sites identified which would be impacted by the proposed action.

III. Environmental Impacts

A. Proposed Action

The removal of excess wild horses and burros by a helicopter would result in minimal disturbance of vegetation as the animals are herded towards the temporary trap and corral.

After the animals have been captured, there would be some soil compaction and temporary loss of vegetation inside the trap and corral facilities. These impacts would be a result of trampling by the captured animals. Since the trap and corral facilities are only temporary (constructed for six days or less) and the surface area disturbed is minimal (one acre or less), no long term significant impacts to the soil or vegetative resources is anticipated. The total number of animals that are handled at each trap site will have an impact on how much disturbance is generated.

If not monitored properly, the use of a contract helicopter could cause undue stress to the animals -- especially to those animals which are already lame, sick or injured. The use of a helicopter could also cause foals to be separated from their mares, bands to split and may cause injuries to the animals.

The removal operations by a contract helicopter will occasionally be monitored by a BLM helicopter. The BLM helicopter could cause additional stress to the animals if not used correctly. Refer to section IV for mitigating measures. These measures would ensure that the BLM helicopter would not create any adverse impacts.

The quality of air would be impaired during the capture operation. This impairment would result from dust in the air as a result of driving the horses to the trap and milling action of the animals in

the corrals. The milling action is of a short duration (less than 40 minutes) and there would be no significant impacts to air quality.

The use of a helicopter to gather excess animals from within WSAs could cause impacts to the quality of WSA values provided that use is not properly regulated. The only impact that cannot be mitigated (see IV. W) is the noise caused by the helicopter when the aircraft is used within the WSA boundary. Although the helicopter would create noise within the WSAs, the noise factor is acceptable under the Interim Management Policy (IMP) and Guidelines for lands under wilderness review.

#### B. Impacts Caused from the Alternatives

The first alternative (water trapping) would probably cause less stress and the chance of injury to the animals. Water trapping would also result in less temporary damage to the vegetation -- the animal would use established trails when coming to the trap site. The noise factor within the WSAs would also be eliminated. Overall, this alternative would result in minimal impact to the environment.

The second alternative (no action) would result in an increase in the number of excess wild horses and burros beyond AMLs. A no action alternative could result in excess numbers reaching a population level that would be detrimental to the vegetative, water and soil resources of the HA, ultimately resulting in significant environmental degradation.

The third alternative (mounted riders) would have substantially greater adverse impacts upon the environment than using a helicopter. This method would increase the disturbance to the vegetative and soil resources, is far more dangerous to animals and humans, is less effective and would result in more foals without mares and split hands.

#### IV. Mitigating Measures

- A. The project helicopter actions may occasionally be observed by a government controlled helicopter. All actions of the government helicopter would be coordinated with the contractor to prevent interference with the project helicopter and contract operations to prevent any stress to the animals and to prevent injuries to humans.
- B. Horse handling should be kept to a minimum. Capture and transporting operations are exceedingly traumatic to the animals. Minimizing the handling would cause less stress to the animals, as well as provide a safer environment for the handlers.
- C. No gathering should be allowed after March 1, and before July 1 because of the potential stress to pregnant and lactating mares and the possibility of induced abortions. Gathering may be resumed after the peak foaling period and after the majority of the foals are grown enough to withstand the stress of gathering operations.

- D. Generally, horses should not be run more than 10 miles during gathering operations depending on weather and environmental conditions.
- E. The contract helicopter shall be used in such a manner that bands or herds would remain together as much as possible.
- F. The rate of movement and distance the animals travel shall not exceed limitations set by the Contracting Officers Representative (COR) or Project Inspector (PI) who would consider terrain, physical barriers, weather, condition of the animals and other factors.
- G. A veterinarian would be on call during gathering operations.
- H. Contract helicopters would be used with caution. A qualified district BLM representative would be present during gathering attempts to insure strict compliance with the above handling limitations and contract stipulations.
- I. Captured horses that are obviously aged, lame, deformed, or sick would be humanely disposed of at the trap site as determined by the COR.
- J. It is estimated that a minimum of twenty-five trap locations would be required to accomplish the work. All trap locations and holding facilities must be approved by the COR or PI prior to construction. The contractor may also be required to change or move trap locations as determined by the COR or PI. All traps and holding facilities not located on public land must have prior written approval of the landowner.
- K. 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 6 feet high. All runways shall be a minimum of 20 feet long and a minimum of 6 feet high and shall be covered with plywood or like material a minimum of 1 foot to 5 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 or PI. 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 1 foot to 5 feet above ground level.
- L. No fence modification would be made without authorization from the COR or PI. The contractor shall be responsible for restoration of any fence modification which he has made.

- M. 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 or PI.
- N. Alternate pens within the holding facility shall be furnished by the contractor to separate mares with small foals, sick and injured animals, and stray 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.
- O. Animals shall be transported to final destination from temporary holding facilities within 24 hours after capture unless prior approval is granted by the COR or PI 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 or PI.
- P. 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.
- Q. It is the responsibility of the contractor to provide security to prevent loss, injury or death of captured animals until delivery to final destination.
- R. The contractor shall restrain sick or injured animals so that they may be provided treatment by the COR or PI. The COR or PI would determine if injured animals must be destroyed and provide for destruction of such animals. The contractor shall dispose of the carcasses as directed by the COR or PI.
- S. The contractor must operate the helicopter 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.
- T. 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.
- U. The COR or PI shall have the means to communicate with the pilot and be able to direct the use of the gather helicopter at all times.
- V. A Cultural Resources inventory would be conducted prior to any construction of facilities, road maintenance, or any other work that may cause surface disturbance.

- W. All temporary trap sites located within the WSA boundaries would be placed on existing roads and ways, not to exceed 50' either side of the access route. Cross-county travel would be allowed so long as it does not cause impacts inconsistent with the requirements of the nonimpairment criteria outlined in the IMP.
- X. All temporary trap sites and other manmade disturbances will be evaluated for the presence of threatened and endangered plant species.

V. Intensity of Public Interest

Nationwide, the wild horse program is very popular and there is much public sentiment to support keeping the present wild horse and burro numbers. Statewide and locally, the general attitude toward wild horses is very different. The ranchers consider the horses, if left uncontrolled, a definite threat to the existence of their livestock operations. The Nevada Department of Wildlife and wildlife enthusiasts can see the competition they place on forage and water needed for game species.

VI. Participating Staff and Signatures

The specialists who have signed the face sheet of this document have been involved in the development and review of the proposed project and concluded it would not significantly impact their resources.

VII. Persons, Groups and Agencies Consulted

American Bashkir Curely Register, Ely, NV  
American Horse Protection Association, Washington, D.C.  
American Humane Association, Denver, CO  
American Wild Mustang & Burro Foundation, Reno, NV  
Animal Protection Institute, Sacramento, CA  
Commission for the Preservation of Wild Horses, Carson City, NV  
Fund For Animals, New York, NY and Phoenix, AZ  
Humane Society of the U.S., Washington, D.C.  
Humane Society of So. Nevada, Blue Diamond, NV  
International Society for the Protection of Mustangs and Burros, Reno, NV  
National Mustang Association, Inc., Newcastle, UT  
National Wild Horse Association, Las Vegas, NV  
Nevada Cattlemen's Association, Elko, NV  
Nevada Federation of Animal Protection Organization, Las Vegas, NV  
Nevada Humane Society, Sparks, NV  
Nevada State Clearinghouse, Carson City, NV  
Nevada State Department of Agriculture, Reno, NV  
Nevada Woolgrowers, Ely, NV  
Save The Mustangs, Rockwood, PA  
U.S. Fish and Wildlife Service, Reno, NV  
Wild Horse Organized Assistance, Reno, NV  
E. Tharalson and Lane Duncan, Inglewood, CA  
Craig Downer, Minden, NV  
Deborah Allard, Brunswick, Maine 04011



Nevada Outdoor Recreation Association  
c/o Mr. Charles Watson  
P.O. Box 1245  
Carson City, NV 89702

The Sierra Club, Toiyabe Chapter  
c/o Mr. Glen Miller  
581 Creighton Way  
Reno, NV 89503

The Wilderness Society  
c/o Jay Watson  
California/Nevada  
Regional Coordinator  
1791-A Pine Street  
San Francisco, CA 94109

The Wilderness Society  
c/o Mr. Terry Sopher  
1400 Eye Street, NW  
10th Floor  
Washington, D.C. 20005

Joe McGloin  
2716 W. 25th Avenue  
Denver, CO 80211

BO-K Exploration  
c/o Bo Kilburn, Director  
P.O. Box 3719  
Carson City, NV 89702

Ms. Debbie Sease  
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330 Pennsylvania Avenue, S.E.  
Washington, D.C. 20003

Mr. David Aberswerth  
National Wildlife Federation  
1325 Massachusetts Avenue, N.W.  
Washington, D.C. 20005

Mr. Brock Evans  
National Audubon Society  
645 Pennsylvania Avenue, S.E., 3rd Floor  
Washington, D.C. 20003

Mr. Clifton R. Merritt  
American Wilderness Alliance  
7600 E. Arapahoe Road  
Suite 114  
Englewood, CO 80112



Phil Briggs  
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Beckville, TX 75631

Rose Strickland  
1685 Kings Row  
Reno, NV 89503

Paul Clifford  
2955 Berkshire  
Cleveland Heights, OH 44118

APPENDIX 1  
 Paradise-Denio MFP III  
 Wild Horses and Burros 1.1

As Currently Written:

WILD HORSE AND BURRO PROGRAM - NON-CHECKERBOARD LANDS

Establish wild horse and burro numbers by herd use area using the following criteria:

Existing/current WH&B numbers (as of July 1, 1982) will 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.

Paradise-Denio Resource Area

<u>Herd Use Area</u>	<u>Wild Horses/Burros</u>	
Owyhee-Bullhead	250/0	CRMP Numbers
Jackson Mountains	215/0	Existing Numbers
McGee Mountain	0/41	Existing Numbers
Black Rock Range East	59/0	Existing Numbers

<u>Herd Use Area</u>	<u>Allotment</u>	<u>Wild Horses/Burros</u>
Owyhee-Bullhead	Little Owyhee	200/0
	Bullhead	50/0
Jackson Mountains	Jackson Mountains	160/0
	Deer Creek	20/0
	Happy Creek	35/0
McGee Mountains	Alder Creek	0/41
Black Rock Range East	Paiute Meadows	59/0

Change To:

The decision will remain as originally written.

Rationale:

43 CFR 4730.3 states:

The biological requirements of wild free-roaming horses and burros will be determined based upon appropriate studies or other available information. The needs for soil and watershed protection, domestic livestock, maintenance of environmental quality, wildlife, and other factors will be considered along with wild free-roaming horse and burro requirements. After determining the optimum number of such horses and burros to be maintained on an area, the authorized officer shall reserve adequate forage and satisfy other biological requirements of such horses and burros and, when necessary, adjust or exclude domestic livestock use accordingly.

The district does not have adequate supportable data upon which to establish the number of wild horses and burros to be maintained on each herd use area. Wild horses and burros must be considered comparable with other resource values in the development of resource management plans. Livestock, wild horses and burros would be kept at existing numbers as a starting point for monitoring purposes unless the conditions listed in the above decision existed. The monitoring program is being designed to determine what the proper stocking level for livestock, wild horses and burros is for each allotment. Adjustments in the numbers of animals to be grazed on each area will be determined through this monitoring process as outlined in Range Management Decision 1.1.

Persons-Organizations That Have Protested This Decision:

1. Nevada Division of State Lands, Carson City, Nevada.
2. Nevada Department of Agriculture, Carson City, Nevada.

APPENDIX 1  
Sonoma-Gerlach MFP III  
Wild Horses and Burros 1.3

As Currently Written:

Remove wild horses and burros from the checkerboard Herd Use Areas (HUAs) unless a cooperative agreement providing for the retention and protection of wild horses and burros is consummated with the affected private landowner(s). Cooperative agreements have not been obtained on the following areas and wild horses should be removed.

<u>Herd Use Areas</u>	<u>Present Est. Numbers* of Horses &amp; Burros To Be Removed</u>
1. Sonoma	330
2. Humboldt	375
3. Trinity	217
4. East Range	315
5. Antelope	226/21
6. Truckee	75
TOTALS	<u>1,538/21</u>

\* Present numbers estimated from 1980 inventory assuming an 11% net increase per year.

Change To:

The decision will remain as originally written. Estimated numbers have been updated to reflect recent inventory and roundup data.

Rationale:

The HUAs designated for complete horse/burro removal are in a checkerboard land pattern. Landowners from each HUA have requested removal of wild horses/burros from their private lands. Section 4 of P.L. 92-195 directs the authorized officer to remove wild horses/burros from private lands at the owner's request.

Persons-Organizations That Have Protested This Decision:

Toiyabe Chapter, Sierra Club, Reno, Nevada.

APPENDIX 1  
Sonoma-Gerlach MFP III  
Wild Horse and Burro 1.1

As Currently Written:

WILD HORSE AND BURRO PROGRAM - NON-CHECKERBOARD LANDS

Establish wild horse and burro numbers by herd use area using the following criteria:

Existing/current WH&B numbers (as of July 1, 1982) will 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.

Sonoma-Gerlach Resource Area

<u>Herd Use Area</u>	<u>Wild Horses/Burros</u>	<u>Existing Numbers</u>
Buffalo Hills	272/0	"
Lava Beds	132/54	"
Fox and Lake Range	434/1	"
Warm Springs Canyon	294/10	"
Black Rock Range West	424/0	"
Seven Troughs	762/105	"
Granite Range	176/0	"
Calico Mountains	514/0	"
Selenite Range	12/1	"
Blue Wing Mountains	89/48	"
Tobin Range	19/0	"
Augusta Mountains	261/0	"
Kamma Mountains	38/0	"
Stillwater Range	52/0	"
Shawave-Nightingale	254/11	"

## APPENDIX 1

<u>Herd Use Area</u>	<u>Allotment</u>	<u>Wild Horses/Burros</u>
Buffalo Hills	Buffalo Hills	272/0
Lava Beds	Blue Wing	85/54
	Seven Troughs	47/0
Fox and Lake Range	Rodeo Creek	334/1
	Pole Canyon	100/0
Warm Springs	Soldier Meadows	294/10
Black Rock Range West	Soldier Meadows	424/0
Seven Troughs	Seven Troughs	619/34
	Blue Wing	143/71
Granite Range	Buffalo Hills	176/0
Calico Mountains	Buffalo Hills	107/0
	Calico	42/0
	Leadville	248/0
	Soldier Meadows	117/0
Selenite Range	Blue Wing	12/1
Blue Wing Mountains	Blue Wing	89/48
Tobin Range	Goldbanks	0/0
	Pleasant Valley	0/0
	Pumpnickel Valley	17/0
	South Buffalo	2/0
Augusta Mountains	Jersey Valley	261/0
Kamma Mountains	Seven Troughs	38/0
Stillwater Range	Pleasant Valley	0/0
	South Rochester	36/0
	Rawhide	0/0
	South Buffalo	16/0
	Jersey Valley	0/0
	Cottonwood Canyon	0/0
Shawave-Nightingale	Blue Wing	254/11

Change To:

The decision will remain as originally written.



Rationale:

43 CFR 4730.3 states:

The biological requirements of wild free-roaming horses and burros will be determined based upon appropriate studies or other available information. The needs for soil and watershed protection, domestic livestock, maintenance of environmental quality, wildlife, and other factors will be considered along with wild free-roaming horse and burro requirements. After determining the optimum number of such horses and burros to be maintained on an area, the authorized officer shall reserve adequate forage and satisfy other biological requirements of such horses and burros and, when necessary, adjust or exclude domestic livestock use accordingly.

The district does not have adequate supportable data upon which to establish the number of wild horses and burros to be maintained on each herd use area. Wild horses and burros must be considered comparable with other resource values in the development of resource management plans. Livestock, wild horses and burros would be kept at existing numbers as a starting point for monitoring purposes unless the conditions listed in the above decision existed. The monitoring program is being designed to determine what the proper stocking level for livestock, wild horses and burros is for each allotment. Adjustments in the numbers of animals to be grazed on each area will be determined through this monitoring process.

Persons-Organizations That Have Protested This Decision:

1. Nevada Division of State Lands, Carson City, Nevada.
2. Nevada Department of Agriculture, Carson City, Nevada.

APPENDIX 1  
Paradise-Denio MFP III  
Wild Horses and Burros 1.4

As Currently Written:

Remove wild horses and burros from the checkerboard Herd Use Areas (HUAs) unless a cooperative agreement providing for the retention and protection of wild horses and burros is consummated with the affected private landowner.

<u>Horse Use Areas</u>	<u>Est. Numbers to be Removed</u>
Eugene Mountains	196*
Krum Hills	268
Slumbering Hills South	296
Osgood Mountains	166
Hot Springs Mountains	131
Lower Paradise Valley	20
Bloody Run Mountains	162

\* Horses and burros

Present numbers estimated from 1977 inventory assuming a 14% survival rate.

Change To:

Remove wild horses and burros from the checkerboard Herd Use Areas (HUAs) unless a cooperative agreement providing for the retention and protection of wild horses and burros is consummated with the affected private landowner.

<u>Herd Use Areas</u>	<u>Present Est. Numbers* of Horses &amp; Burros To Be Removed</u>
Eugene Mountains	114
Krum Hills	194
Slumbering Hills South	122
Osgood Mountains	33
Hot Springs Mountains	79
Lower Paradise Valley	20
TOTAL	<u>562</u>

\* Present numbers estimated from 1980 inventory assuming a 14% net increase per year.

Estimated numbers have been updated to reflect recent inventory and roundup data.

MFP III WHB 1.4 (continued)

DISTRICT MANAGER'S DECISION

Remove wild horses and burros from the following checkerboard Herd Use Areas (HUAs) unless a cooperative agreement providing for the retention and protection of wild horses and burros is consummated with the affected private landowner.

<u>Horse Use Areas</u>	<u>Est. Numbers to be Removed</u>
Eugene Mountains	196*
Krum Hills	268
Slumbering Hills South	296
Osgood Mountains	166
Hot Springs Mountains	131
Lower Paradise Valley	20
Bloody Run Mountains	162

\* Horses and burros

Present numbers estimated from 1977 inventory assuming a 14% survival rate.

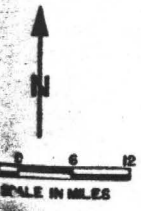
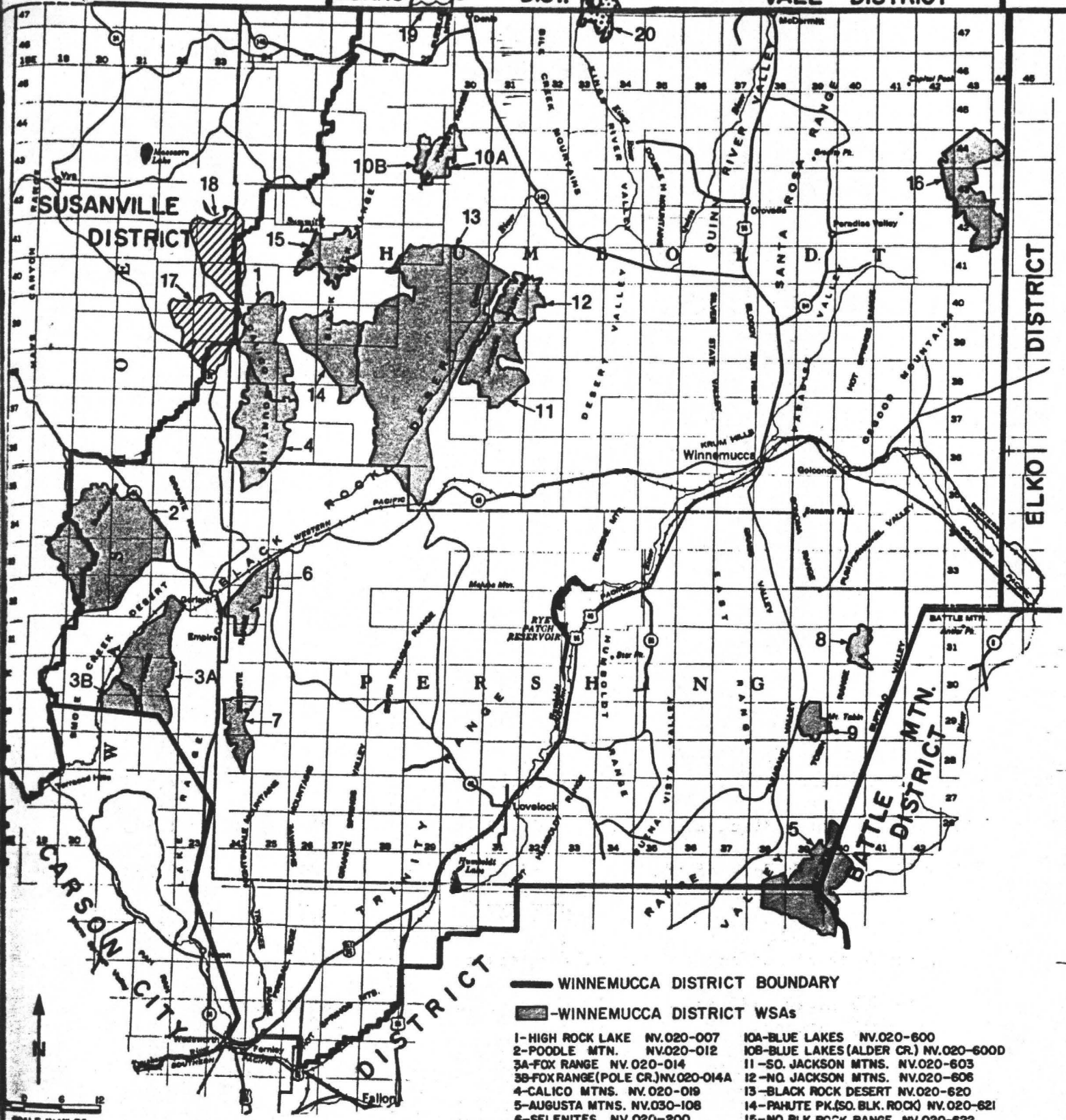
Rationale:

The HUAs designated for complete horse/burro removal are in a checkerboard land pattern. Landowners from each HUA have requested removal of wild horses/burros from their private lands. Section 4 of P.L. 92-195 directs the authorized officer to remove wild horses/burros from private lands at the owner's request.

Persons-Organizations That Have Protested This Decision:

Toiyabe Chapter, Sierra Club, Reno, Nevada.

BURNS DIST. VALE DISTRICT

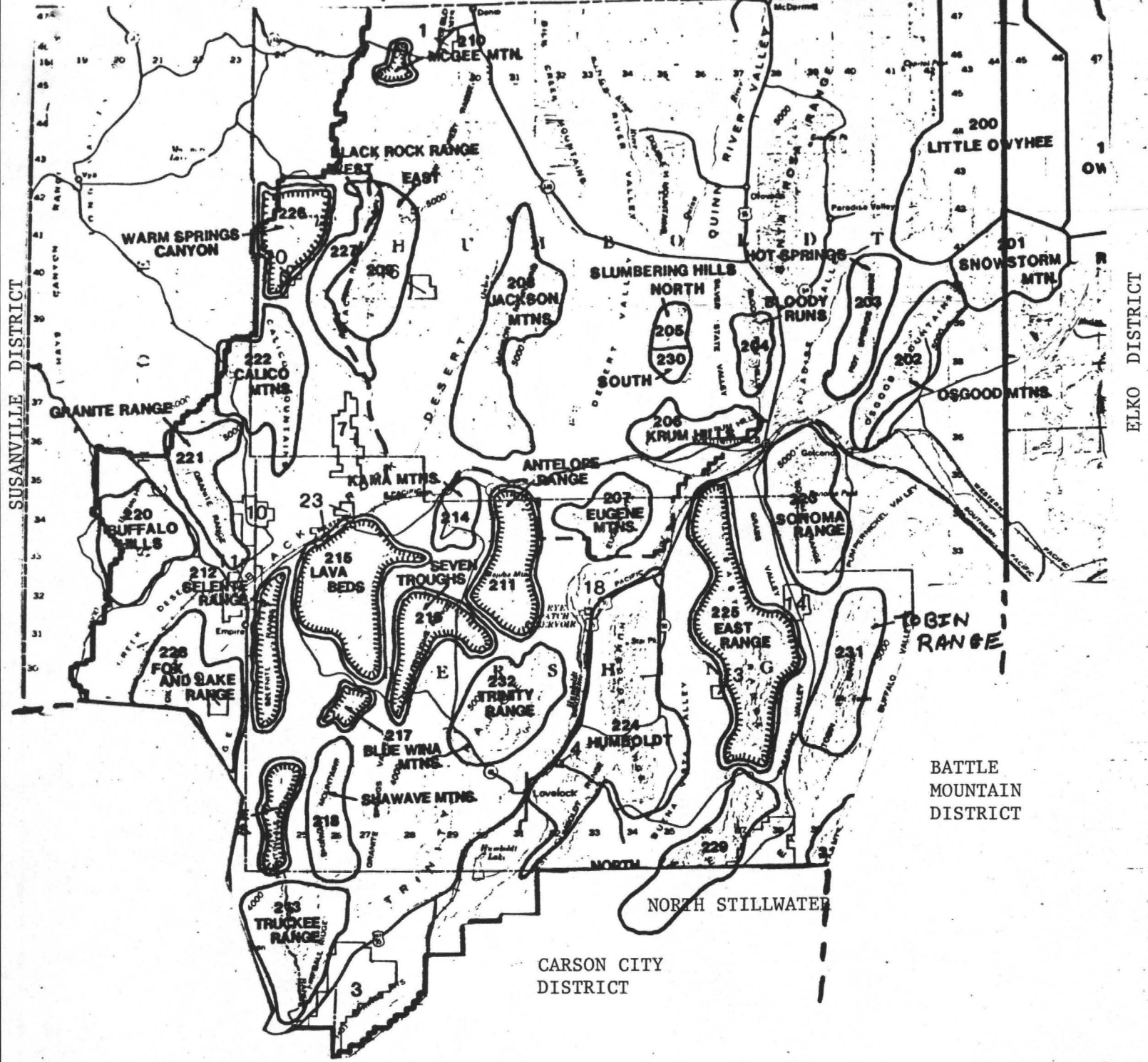


WINNEMUCCA DISTRICT





- WINNEMUCCA DISTRICT BOUNDARY
- -WINNEMUCCA DISTRICT WSAs
- 1-HIGH ROCK LAKE NV.020-007
- 2-POODLE MTN. NV.020-012
- 3A-FOX RANGE NV.020-014
- 3B-FOX RANGE(POLE CR.)NV.020-014A
- 4-CALICO MTNS. NV.020-019
- 5-AUGUSTA MTNS. NV.030-108
- 6-SELENITES NV.020-200
- 7-MT. LIMBO NV.020-201
- 8-TOBIN MTNS.(CHINA MT) NV.020-406P
- 9-TOBINS NV.020-406Q
- 10A-BLUE LAKES NV.020-600
- 10B-BLUE LAKES (ALDER CR.) NV.020-600D
- 11-SO. JACKSON MTNS. NV.020-603
- 12-NO. JACKSON MTNS. NV.020-606
- 13-BLACK ROCK DESERT NV.020-620
- 14-PAHUTE PK.(SO. BLK. ROCK) NV.020-621
- 15-NO. BLK. ROCK RANGE NV.020-622
- 16-NO. FORK LITTLE HUMBOLDT RIVER NV.020-827
- /// -SUSANVILLE DISTRICT WSAs
- 17-LITTLE HIGH ROCK CANYON NV.020-008
- 18-HIGH ROCK CANYON NV.020-006A
- ~ -BURNS DISTRICT WSAs
- -VALE DISTRICT WSAs
- 19-PUEBLO MTNS. NV.020-642
- 20-DISASTER PK. NV.020-859





ATTACHMENT #2

-  = Wild Horse Herd Area Boundary
-  = Burro Herd Area Boundary



# W<sup>5/27/87</sup>H<sup>5/27/87</sup>O<sup>5/27/87</sup>A!

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

May 27, 1987

Mr. Frank Shields, District Manager  
Bureau of Land Management  
705 East 4th Street  
Winnemucca, Nevada 89445

Dear Mr. Shields:

Thank you very much for the opportunity to comment on the Draft wild horse capture and associated environmental assessment (NV-010-7-036), proposed for the Winnemucca and Elko Districts for the Little Owyhee/Bullhead, Little Humbolt, Rock Creek, and Spruce/Pequop herd management areas.

WHOA refuses to consider a cooperative effort between Winnemucca and the Elko District for the purpose of further reducing the wild horses in the Winnemucca Districts' portion, the Little Owyhee/Bullhead herd management areas.

In 1982, WHOA formally signed a coordinated resource management plan (CRMP) wherein the wild horse groups (WHOA and ISPMB) would support the appropriate management level of 200 adult wild horses in the Little Owyhee and 50 adult wild horses in the Bullhead herd management areas. We agreed to support reductions and pursue funding for the same, which we did; in exchange the livestock permittees and the Bureau of Land Management were to undertake specific range improvements, and fence removals and corrections, on a specified time schedule.

It is now May 1987, five years after the agreement was signed. The wild horses have been significantly reduced, in three successive years. Over 4000 wild horses have been removed from the two allotments since 1977, 2500 since the agreement was signed. The wild horse groups have lived up to their portion of the agreement, and it is that portion that has been completed. WHOA requests an extension of time to acquire the full list of the uncompleted projects from the Winnemucca District Office; upon receipt of that full disclosure, WHOA reserves the right to submit an addendum to this comment.

The continued complaints from Nevada First Corporation, and the fact that they have submitted repeatedly amendments for flexibility to the original document; combined with the fact that neither permittees or the Bureau of Land Management have lived up to their portion of the agreement, disclose the real purpose behind the CRMP agreement was to significantly reduce the wild horse population to benefit livestock. The AMPs for Little Owyhee and Bullhead were signed in 1972 and 1985 respectively, and both contain conflicts that have not been resolved. (See DHMAP, pg. 7) The land use plan did not reserve any forage for

Page two  
Little Owyhee/Bullhead

wild horses and the decision was to base any further adjustments in grazing use based on monitoring. The DHMAP, pg. 6 states, "Based on land use plan decisions, and subsequent CRMP recommendations, the forage use levels (for 1985 through 1988) for the Bullhead Allotment will be 8350 AUMs for livestock and 600 AUMs for wild horses. After 1988, levels of use will be determined by management decision based upon monitoring data." However, the DHMAP states under Habitat Objectives that "By 1988 provide 3578 AUMs of forage for wild horses in the Little Owyhee herd management area, and 900 AUMs for wild horses in the Bullhead herd management areas."

The gathering of wild horses in the Little Owyhee and Bullhead herd management areas is not warranted or justifiable so close, and in advance of, the monitoring. The rationale being, if based on the evaluation of monitoring, an increase is warranted, then the BLM has conducted a capture for no reason. On the other hand, if a decrease is warranted, based on the evaluation of monitoring, the original gathering could be insufficient and require another capture. The Winnemucca District proposes to reduce wild horses from both allotments in FY 1988 (October, 1987), but the grazing fee year is in March of 1988 and realistically, the livestock permittees could receive an increase in livestock, with wild horses absent from enjoying their proportionate share of the increase.

I have spoken with Mrs. Helen Reilly of the International Society for the Protection of Mustangs and Burros, a co-signee of the CRMP agreement, and she concurs the reductions in the Little Owyhee and Bullhead herd management areas are not acceptable. Therefore, it is our firm position that the document signed as a CRMP agreement is null and void, for non-compliance, and any future activities regarding the appropriate management levels are no longer applicable. WHOA is prepared to pursue this issue further should our concerns be disregarded.

Respectfully submitted,

Dawn Y. Lappin (Mrs.)  
Director

cc: David A. Hornbeck  
Board of Trustees  
Helen A. Reilly  
Mr. E. F. Spang  
Mr. Rodney Harris  
National Coalition of Animal Organizations

Meeting Agenda Committee to Review Feb 18, 1987  
Wild Horse Resol.

1. Review Committee purpose - see Regulations
2. Plan report to Council
  - a/ Summaries & copies (?) 2 resol.
  - b/ " " " " W.H. Adv. Bd  
Acw
  - c/ " " " " SJR 7

2. Statistics of interest

- 1982 - Adoption Fee raised from \$25. to \$200. for horses & \$75. for Burros.
- ? - Increased to \$135.
- 1978 - Euthanasia authorized
- 1982 - Moratorium on euthanasia
- 1984 - 6,084 removed; 5,491 adopted
- 1985 - 18,959 removed; 9,554 adopted
- 1986 - 10,000 removed; 7,600 adopted
- 1987 - 5,000 to be removed + 1,500 Court-ordered?

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- 1971 - 17,000 on range in Nevada
- 1978 - 67,500 on range in West
- 1987 - 27,500 on range West  
Holding Facilities - 10,000

Future plans: Approx ~~15,000~~ 5,000 removed yearly  
" " " " 18,000 on range (may  
other states, in holding be only in Nev.)