

G 10/10/87

IN REPLY REFER TO:



# United States Department of the Interior

4700 (NV-013)

## BUREAU OF LAND MANAGEMENT ELKO DISTRICT OFFICE

3900 E. Idaho Street  
P.O. Box 831  
Elko, Nevada 89801

*Nov. 10,*

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P.O. 1  
Reno,

Dear Sirs.

Attached is a Draft Copy of a Gathering Plan and Associated Environmental Analysis for the Antelope Valley, Antelope and Goshute Wild Horse Herd Management Areas. Please review and submit any comments you may have to this office by November 10, 1987.

Sincerely yours,

RODNEY HARRIS  
District Manager

WILD HORSE CAPTURE PLAN

Antelope Valley - Antelope - Goshute Herd Management Areas

Introduction

The majority of the proposed gathering area is located in the Currie Planning unit of the Wells Resource Area. This area is generally the southeast portion of Elko County. The gathering area also includes a portion of the northeast corner of White Pine County in the Ely D.O. The area covers three wild horse herd management areas (see attached maps).

This document outlines the process that will be involved in the wild horse gather for the Antelope Valley, Antelope and Goshute wild horse herd areas. Included are the number of horses to be captured, the time and method of capture and the handling and disposition of captured horses.

None of the herd management areas are covered by a herd management area plan, however, an RMP-EIS has been developed for the Wells Resource Area and an EIS has been done on the Schell Resource area of the Ely District. These documents have established upper and lower limits of horses to be managed in the respective herd areas. The proposed gather is to reduce horse numbers to conform to the EIS levels, this action is therefore, considered a part of long-term management.

Number of Horses to be Gathered

The proposed number of horses to be gathered is shown by herd area as follows:

<u>Herd Area</u>	<u>Nos. to be Managed</u>	<u>No. Inventoried</u>	<u>Nos. to be Gathered</u>
Antelope Valley (Elko)	131 to 164	366	235
Antelope (Ely)	303	782	479
Goshute	<u>96 to 120</u>	<u>222</u>	<u>126</u>
Total	530 587	1370	840

This is based on post gathering census conducted in February 1987 in conjunction with Ely District. A post gather census will be conducted on the HMA to ensure that the AMC remains after the gather.

Time and Method of Capture

The gather is expected to take place during FY 1988, and last approximately four weeks. Approximately start date should be February 1, 1988.

The method of capture to be used will be a helicopter to bring the horses to trap sites and horseback riders at the wings of portable traps. The temporary traps and corrals will be constructed from portable pipe panels. Trap will need a holding area for horses prior to transport to the temporary holding facility.

Areas of possible trap sites will be selected by the BLM actual sites will be jointly determined by the COR and the contractor. Trap sites will receive cultural and T&E plant and animal clearance prior to use.

Trap sites will be located to cause as little injury to horses and as little damage to the natural resources of the area as possible. More than one trap site per head area may be required, as determined by the COR, to relieve stress to pregnant mares, foals, and other horses caused by certain conditions at the time of the gather (i.e., dust, rocky terrain, temperatures, etc.).

Due to the many variables such as weather, time of year, location of horses, and suitable trap sites, it is not possible to identify specific locations at this time. They will be determined at the time of the gather.

During the time that the gather is scheduled (February 1988) the horses are concentrated in the valleys between mountain ranges. The terrain is flat to rolling with no physical barriers. There are few fences in the area and the contractor will be instructed to avoid them.

Branded and Claimed Animals

A notice of intent to impound and a 28 day notice to gather wild horses will be issued concurrently by the BLM prior to any gathering operations in this area.

The Nevada Department of Agriculture and the District Brand Inspector will receive copies of these notices, as well as the Notice of Public Sale if issued.

The COR/PI will contact the District Brand Inspector and make arrangements for dates and time when brand inspections will be needed.

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When horses are captured, the COR/PI and the District Brand Inspector will jointly inspect all animals at the holding facility in the gathering area. If determined necessary at that time by all parties involved, horses will be sorted into three categories.

- A. Branded animals with offspring, including yearlings.
- B. Unbranded or claimed animals with offspring, including yearlings with obvious evidence of existing or former private ownership (e.g. photo documentation, saddle marks, etc.).
- C. Unbranded animals and offspring without obvious evidence of former private ownership.

The COR/PI, after consultation with the District Brand Inspector, will determine if unbranded animals are wild and free-roaming horses. The District Brand Inspector will determine ownership of branded animals and their offspring and if possible the ownership of unbranded animals determined not to be wild and free-roaming horses.

Branded horses with offspring and claimed unbranded horses with offspring for which the owners have been identified by the District Brand Inspector will be retained in the custody of the BLM pending notification of the owner or claimant.

A separate holding corral will be set up near the temporary holding corral to house these horses until the owner or claimant can pick them up.

The animals will remain in the custody of the BLM until settlement in full is made for impoundment and trespass charges as determined appropriate by the Schell Area Manager or Wells Area Manager in accordance with 43 CFR Subpart 4720.3 and provisions in 43 CFR Subpart 4150. In the event settlement is not made the horses will be sold at public auction by the BLM.

Branded horses with offspring whose owners cannot be determined and unclaimed, unbranded horses with offspring having evidence of existing or former private ownership will be released to the Nevada Department of Agriculture (District Brand Inspector) as estrays.

The District Brand Inspector will provide the COR/PI a brand inspection certificate for the immediate shipment of wild horses to Palomino Valley (Reno) and for the branded or claimed horses where impoundment and trespass charges have not been offered or received for shipment to public auction or another holding facility.

Destruction of Injured or Sick Animals

Any severely injured or seriously sick animal shall be destroyed in accordance with 43 CFR 4740.3-1. Animals shall be destroyed only when a definite act of mercy is needed to alleviate pain and suffering. The COR will make this determination, with advice from a veterinarian, when unsure of the severity of the illness or injury. Destruction will be done in the most humane method available. A veterinarian can be called from Elko if necessary to care for any injured horses.

Disposal of the carcass will be in accordance with I.M. No. NV-83-84.

Administration of the Contract

The COR will be the Elko District Wild Horse Specialist. The COR will be directly responsible for conducting the roundup and can appoint other BLM personnel to assist with the roundup as necessary. The Ely District Wild Horse Specialist will serve as project inspector when gathering operations are taking place in the Ely District.

To assist the COR in administering the contract, BLM will have a helicopter available at the round up site. This helicopter will be used with discretion to minimize disturbance of horses that would make gathering more difficult. However, it will be used as needed to assure that the contractor is complying with the specifications of the contract.

The COR is directly responsible for the conduct of the gathering operation, and is responsible for keeping the Elko District Manager, the Ely District Manager and the Nevada State Office informed on the progress of the gathering operation.

If the contractor fails to perform in an appropriate manner at anytime, the contract will not be allowed to continue until problems encountered are corrected to the satisfaction of the COR.

Contractors Briefing

The contractor, after award of the contract, will be briefed on his duties and responsibilities before the notice to proceed is issued.

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L A B E - F B V S E

There will also be an inspection of the contractors equipment at this time to assure that it meets specifications and is adequate for the job. Any equipment that does not meet specifications must be replaced within 36 hours. The contractor will also be informed of the terrain involved, the condition of the animals, the condition of the roads, potential trap locations, and the presence of fences and other dangerous barriers.

#### Temporary Holding Facility

The holding facility shall be on public land unless an agreement is made between the contractor and a private landowner for use of private facilities. When private land is used, the contractor must guarantee BLM, and the public, access to the facility and accept all liability for use of such facilities. The contractor shall provide all feed, water, labor and equipment to care for captured horses at the holding facility, and transportation of captured horses from the temporary holding facility to the Nevada Distribution Center, Palomino Valley (Reno), Nevada. All work will be done according to the following specifications and attached work location map. All labor, vehicles, helicopters, traps, troughs, feed, temporary holding facilities and other equipment, including but not limited to the aforementioned, shall be furnished by the contractor. BLM will furnish contract supervision.

#### Detailed Specifications

##### A. Roundup procedures within contract area:

1. The COR/PI will determine specific roundup areas and number of horses within each herd area as animal concentration and weather
- S 2 X C O L L O W F I B E B U S A

conditions dictate. Numbers of horses to be gathered by herd area is shown as follows:

Antelope Valley (Elko)	235
Antelope Herd Area (Ely)	479
Goshute Herd Area (Elko)	126
TOTAL	840

2. A portion of the contract area is in a military operations area where low level flights by jet aircraft can occur (see attached map). It will be necessary for the contractor to make arrangements with Hill Air Force Base, Clover Control, using VHF radio on assigned frequency to make sure flight areas are not being used by low flying jet aircraft. No flights will be allowed until clearance has been received.

3. The COR will determine specific roundup areas and numbers of animals within general contract areas as animal concentration and weather conditions dictate.

B. In addition to the provisions of 43 CFR Part 4700, the use of the helicopter shall be further regulated to the extent that:

1. The helicopter shall be used in such a manner that bands or herds will tend to remain together.

2. The rate of movement shall not exceed limitations set by the COR who shall consider terrain, weather, distance to be traveled, and condition of the animals.

3. When refueling, the helicopter must remain a distance of at least a 1,000 feet or more from the temporary holding facility, vehicles (other than fuel truck), and personnel not involved in refueling.

C. Motorized Equipment

1. All motorized equipment employed in the transportation of captured animals shall be in compliance with appropriate State and Federal laws and regulations applicable to the humane transportation of animals.
2. Vehicles shall be in good repair, of adequate rated capacity, and operated so as to insure that captured animals are transported without undue risk or injury.
3. Only stocktrailers shall be allowed for transporting animals from traps to temporary holding facilities. Only Bobtail trucks, stocktrailers, or single deck trucks shall be used to haul animals from temporary holding facilities to final destination. Sides or stockracks of transporting vehicles shall be a minimum height of 6 feet 6 inches from vehicle floor. Single deck trucks with trailers 40 feet or longer shall have two partition gates to separate animals. Trailers less than 40 feet shall have at least one partition to separate the animals. The use of double deck trailers is unacceptable and shall not be allowed.

4. All vehicles used to transport animals to final destination shall be equipped with doors at the rear end of the vehicle. At least one of these rear doors shall be capable of sliding either horizontally or vertically.
5. Floors of vehicles shall be covered and maintained with a non-skid surface such as sand, mineral soil or wood shavings, to prevent the animals from slipping.
6. The number of animals to be loaded and transported in any vehicle shall be as directed by the COR and may include limitations on numbers according to age, size, sex, temperament and animal condition.
7. The COR shall consider the condition of the animals, weather conditions, type of vehicles, distance to be transported, or other factors when planning for the movement of captured animals. The COR shall provide for any brand and/or inspection services required for the captured animals.
8. If the COR determines that dust conditions are such that the animals could be endangered during transportation, the contractor will be instructed to adjust speed. The maximum distance over which animals may have to be transported on dirt road is approximately twenty miles per load.
9. Vehicles traveling within WSA boundaries will be confined to existing roads and ways.

D. Trapping and Care

1. All capture attempts shall be accomplished by the utilization of a helicopter. Wing riders may be used if necessary. Roping will be done only when necessary, with prior approval by the COR. Under no circumstances shall animals be tied down for more than one hour.
2. The helicopter shall be used in such a manner that bands or herds will remain together as much as possible.
3. The rate of movement and distance the animals travel shall not exceed limitations set by the COR who will consider terrain, physical barriers, weather, condition of the animals and other factors.
4. It is estimated that six trap locations will be required to accomplish the work. All trap locations and holding facilities must be approved by the COR prior to construction. The contractor may also be required to change or move trap locations as determined by the COR. All traps and holding facilities not located on public land must have prior written approval of the landowner.
5. 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 runaways shall be a minimum of 20 feet long and a minimum of 6 feet high. All runaways shall be a minimum of 20 feet long and 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. All crowding pens including the gates leading to the runaways 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.

6. No fence modification will be made without authorization from the COR. The contractor shall be responsible for restoration of any fence modification or damage which he has made.
7. 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.
8. Alternate pens, within the holding facility shall be furnished by the contractor to separate mares with small foals, sick and injured animals, and estray 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.

9. Animals shall be transported to final destination from temporary holding facilities within 24 hours after capture unless prior approval is granted by the COR 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.
10. 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.
11. It is the responsibility of the contractor to provide security to prevent loss, injury or death of captured animals until delivery to final destination.
12. The contractor shall restrain sick or injured animals so that they may be provided treatment by the COR. The COR will 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.

F. Helicopter, Pilot and Communications

1. The contractor must operate 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.

2. When refueling, the helicopter shall remain a distance of at least 1,000 feet or more from animals, vehicles (other than fuel truck), and personnel not involved in refueling.
3. The COR shall have the means to communicate with the pilot and be able to direct the use of the gather helicopter at all times. The frequency(s) used for this contract will be assigned by the COR when the government furnished "slip-on" VHF/FM portable radio is used. When a VHF/AM radio is used, the frequency will be 122.925 MHz.
4. The contractor shall obtain the necessary FCC licenses for the radio system.
5. The proper operation, service and maintenance of all contractor furnished helicopters is the responsibility of the contractor. The BLM reserves the right to remove from service pilots and helicopters which, in the opinion of the contracting officer or COR violate contract rules, are unsafe or otherwise unsatisfactory. In this event, the contractor will be notified in writing to furnish replacement pilots or helicopters within 48 hours of notification. All such replacements must be approved in advance of operation by the contracting officer or his/her representatives.

Prepared by:

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BRUCE E. PORTWOOD  
Wild Horse & Burro Specialist  
Elko District Office

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Date

Reviewed by:

Reviewed by:

\_\_\_\_\_  
JOHN A. PHILLIPS  
Wells Area Manager  
Elko District Office

\_\_\_\_\_  
Date

\_\_\_\_\_  
JERRY SMITH  
Schell Area Manager  
Ely District Office

\_\_\_\_\_  
Date

Concurred by:

Concurred by:

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RODNEY HARRIS  
District Manager  
Elko District Office

\_\_\_\_\_  
Date

\_\_\_\_\_  
KENNETH WALKER  
District Manager  
Ely District Office

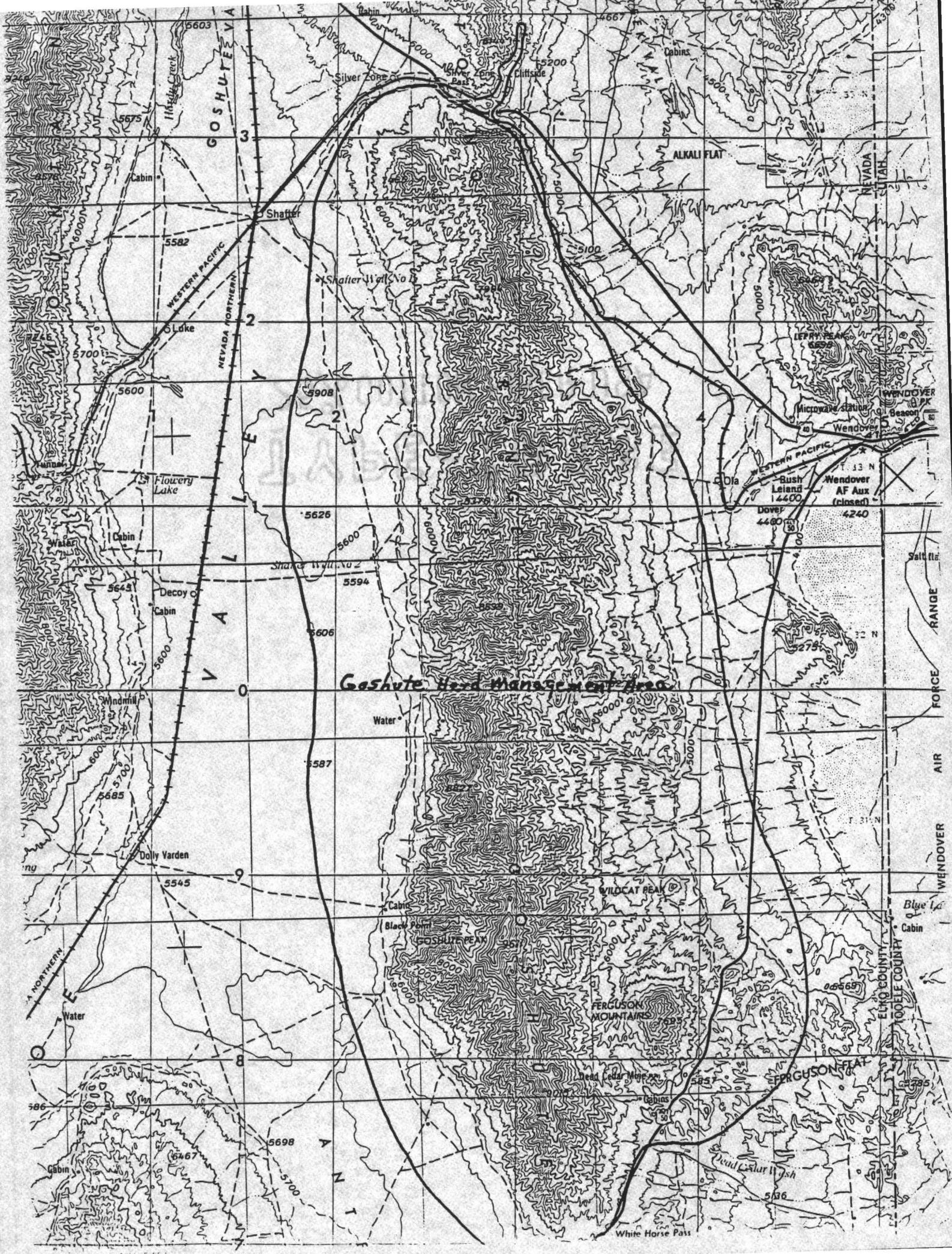
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Approved by:

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EDWARD SPANG  
State Director

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Date





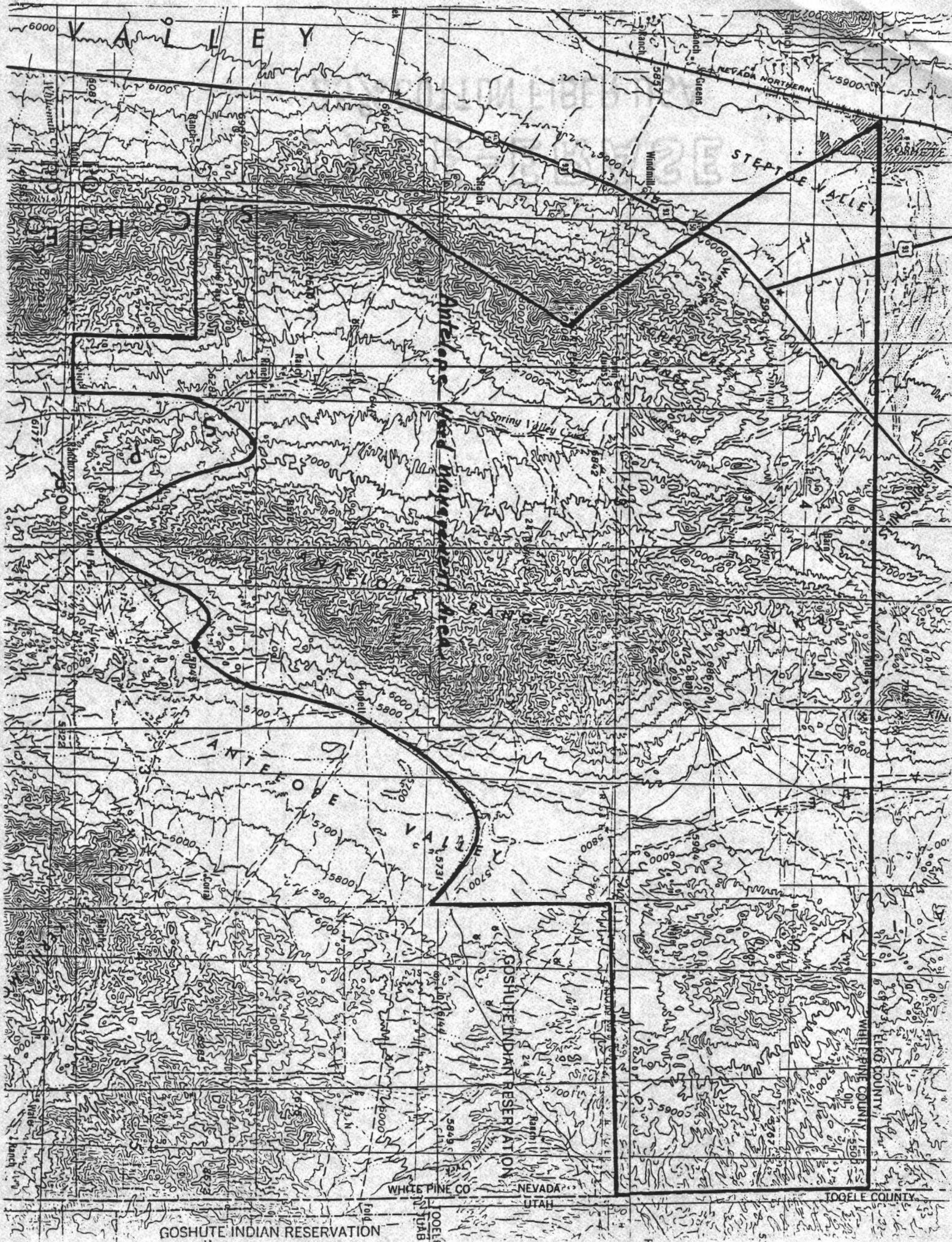
*Goshute Herd Management Area*

G O S H U T E  
V A L L E Y

W E N D O V E R  
A I R  
F O R C E  
R A N G E

E L I N G  
C O U N T Y  
T O O L E  
C O U N T Y

White Horse Pass



V A L L E Y

STEPTOE VALLEY

Antelope Valley Management Area

ANTELOPE VALLEY

GOSHUTE INDIAN RESERVATION

WHITE PINE CO. NEVADA

TOOFE COUNTY

GOSHUTE INDIAN RESERVATION

UTAH

EST-0107

ENVIRONMENTAL ASSESSMENT NO. NV-010-7-104

Antelope Valley - Antelope, Goshute

I. DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

The Wells Resource Area, in the Elko District, is proposing the use of a helicopter, construction of traps, and holding corrals to gather excess wild horses. Refer to the Wells Resource Management Plan(s) for analysis of the appropriate management levels of wild horses.

A. Introduction

As a result of excess wild horses within the herd management areas involved (see attached Antelope Valley, Antelope, and Goshute Capture Plan), it is necessary to determine the most cost efficient, effective and safest (to horses, as well as people, involved in the gather) method of gathering excess animals.

Several methods of wild horse capture exist, but only those methods accepted by BLM will be discussed.

Regardless of the method of capture chosen, it will also be necessary to construct temporary traps as well as temporary holding corrals. Impacts from such construction will be discussed within section III (A) of this E.A.

B. Proposed Action

The proposed action consists of using a helicopter to gather excess wild horses. The helicopter would locate the bands of wild horses and drive them into the traps using wing riders (wranglers on horse back) where desired and necessary. The gathering would continue until the appropriate herd management levels have been reached. Hazards such as cliffs and fences would be scouted in advance and existing roads and trails would be used.

Several temporary traps with deflector wings encompassing less than one acre would be erected on lands in each herd area. Temporary trap and corral sites would be selected by the contractor from potential sites selected by the BLM. Each facility would be constructed from portable panels. These traps and corrals would be moved from place to place during the gathering operation and completely removed from the area after the contract is completed. It is estimated that seven trap sites will be needed encompassing less than seven acres of surface disturbance.

C. Stipulations

1. Horse handling will be kept to a minimum. Capture and transporting operations are exceedingly traumatic to the animals. Minimizing the handling would increase the safety of the animals, as well as the handlers.

2. No gathering will be allowed after March 1, 1988 because of the potential stress to pregnant and lactating mares and the possibility of induced abortions. Gathering may be resumed after the foaling period and after foals are grown enough to withstand the stress of gathering operations.
3. Horses will not be run more than 10 miles during gathering operations, unless authorized by the COR.
4. A veterinarian will be on call during gathering operations.
5. Helicopters will be used with caution. A qualified district BLM representative will be present during gathering attempts to insure strict compliance with the above mileage limitations and CFR 4700 regulations.
6. Captured horses that are obviously aged, lame, deformed, or sick will be humanely disposed of at the trap site.
7. A cultural resources investigation by an archaeologist or D.A.T. will be made prior to any trap construction. If a significant cultural resources are discovered, an alternative trap site will be selected.
8. Trap sites or holding corrals will not be placed on any sites with any threatened or endangered plant species present.

D. Alternatives

1. Water trapping as an alternative has been considered. This involves placing temporary corrals with one way gates at water sources.

Due to the numerous water sources within the areas being trapped, it would not be possible to use this method and will no longer be considered.

2. Gathering of wild horses by wranglers on horse back as an alternative has been considered. This involves people on horse back locating the horses and trying to drive the wild horses into the portable traps.

Often times, the wild horses will out run the wranglers and scatter prior to reaching the trap. There is also an increased risk of injury to the wild horses as well as the wranglers and their horses since hazards cannot be seen in advance. This method takes longer and is not cost effective. For these reasons, this alternative is not feasible and will not be considered further.

3. No Action - the no action alternative would result in no wild horses being gathered, and herd levels would not be held at authorized management levels, therefore, this alternative is not considered further.

## II. DESCRIPTION OF THE EXISTING ENVIRONMENT

The proposed gathering area covers three wild horse herd management areas in southeastern Elko County and northeastern White Pine County (see attached maps).

The following table shows the herd areas that will be affected as well as the number of wild horses to be gathered:

<u>Herd Area</u>	<u>Nos. to be Managed (AML)</u>	<u>No. Inventoried</u>	<u>Nos. to be Gathered</u>
Antelope Valley (Elko)	131 to 164	366	235
Antelope (Ely)	303	782	479
Goshute	96 to 120	222	126
TOTAL	<u>530 to 587</u>	<u>1370</u>	<u>840</u>

This is based on February 1987 census.

A complete description of the existing environment can be found in the Wells RMP/EIS and Schell Grazing EIS.

### A. Non-living Components

The topography of these herd areas consists of valley floors, alluvial fans, canyons, mountains, steep ridges, and basins. Annual precipitation varies from 20 inches in higher elevations to eight inches or less at the lower elevations. The bulk of the precipitation occurs through early spring rains and winter snows.

Temperatures range from summer maximums in excess of 90° F. to winter lows falling below zero.

Air quality is good although short-term increases in fugitive dust levels occur as the result of climatic variations and vehicular traffic.

Soil textures are generally loams, clay loams, and silt loams, most of which are capable of supporting desirable species of vegetation. The following table depicts soil characteristics:

<u>General Distribution</u>	<u>Principal Soil Orders</u>	<u>Productivity</u>	<u>Erosion Susceptibility</u>
Mountains	Mollisols	Moderate-High	Moderate
Benches and Alluvial Fans	Aridisols	Moderate	Moderate
Valley Floors	Aridisols and Entisols	Low	Slight

Springs, reservoirs, and intermittent streams provide a sparse water supply of generally fair to good quality. Competition by large animals (wildlife, horses, livestock) for use of the water is a threat to future maintenance of water quality as evidenced by excessive trampling of undeveloped springs and seeps.

B. Living Components

1. Terrestrial Plants

Major plant associations may be characterized by big sagebrush-grass, low sagebrush-grass, and winterfat-saltbush flats.

The dominant shrub in the sagebrush-grass community is big sagebrush (Artemisia tridentata), low sagebrush (Artemisia arbuscula), and/or black sagebrush (Artemisia nova). Common grasses include bluebunch wheatgrass (Agropyron spicatum), Indian ricegrass (Oryzopsis hymenoides), Idaho fescue (Festuca idahoensis) and Sandberg bluegrass (Poa secunda). Forbs include arrowleaf balsamroot (Balsamorhiza sagittata) and lupine (Lupinus spp.). Utah juniper (Juniperus osteosperma) is associated with an understory of sagebrush and grass. In addition, widespread patches of aspen (Populus tremuloides), bitterbrush (Purshia tridentata), and curlleaf mountain mahogany (Cercocarpus ledifolius) are found at the higher elevations.

The valley floor is dominated by shadscale (Atriplex confertifolia), winterfat (Ceratoides lanata), sweetsage (Atriplex nuttallii), cheatgrass (Bromus tectorum), Indian ricegrass (Oryzopsis hymenoides) and Russian thistle (Salsola kali). There are also extensive areas of greasewood (Sarcobatus vermiculatus) in the saline bottoms. Invasions of halogeton (Halogeton glomeratus) are common on disturbed areas. There are also extensive areas of little rabbitbrush (Chrysothamnus viscidiflorus).

2. Aquatic and Riparian Plants

The major aquatic and riparian plants are willow (Salix spp.), cattail (Typha latifolia), coontail (Ceratophyllum spp.), duckweed (Lemna spp.), horsetail (Equisetum spp.), lovegrass (Eragrostis spp.), monkey flower (Minulus spp.), pondweed (Potamogeton spp.) and rabbitfoot grass (Polypogon monspeliensis).

3. Aquatic Animals

Common aquatic or riparian area mammals which inhabit these areas include the beaver and raccoon. Several species of water-associated birds have been observed utilizing streams, springs, and reservoirs. Several species of amphibians and fish are also found in this area.

The Relict (Steptoe) Dace is listed as a rare fish species by the State of Nevada and is a "Category 2" species being considered for listing as threatened or endangered by the U.S. Fish and Wildlife Service. Its distribution is limited to several valleys in Elko and White Pine counties within the subject area. It will not be affected by the proposed action.

4. Terrestrial Animals

The most common species of mammals that can be seen are domestic cattle and sheep, horses (domestic and wild), mule

deer, pronghorn, bobcat, badger, black-tailed jackrabbit, cottontail rabbit and Belding's ground squirrel.

The more common species of birds include sage grouse, chukar, golden eagle, and red-tailed hawk. The Goshute Mountains have been identified as a major fall migration route for many species of raptors. A variety of passerine and non-passerine falcons, both endangered species, are known to inhabit these herd areas during the months of November through March.

Horses have occurred in this area for many years. They are all descendants of ranch horses that were released in the area and have continued to propagate and increase.

5. Mining Claims

Mining claims exist in the area, however, will not be affected as a result of the proposed activities and will not be discussed further.

6. Threatened and Endangered Plant Species

There are two plant species "of special concern" currently on the State of Nevada Watch List which are known to exist within these three herd areas:

Coryphantha vivipara var. rosea is known to exist

southwest of Wendover, Nevada in section 32, T. 33 N., R. 69 E. This plant is generally found on gravelly limestone or volcanic slopes, brushy hillsides and alluvial fans. Other plants found to be associated with this species are littleleaf horsebrush, Indian ricegrass, halogeton, and cheatgrass.

Thelypodium sagittatum var. ovalifolium is known to exist northeast of Lages Station, Nevada in sections 12 and 13, T. 25 N., R. 65 E. This plant is generally found on moist clay soils by springs, streams, or lakes. This plant is found to be associated with sagebrush, greasewood, and rabbitbrush.

7. Wilderness Study Areas (WSA)

Two WSAs (Goshute Peak and Bluebell WSA) occur in the gather area. The use of aircraft for removing wild horses from within WSAs is consistent with the Interim Management Policy and Guidelines (IMP), for lands under wilderness review 12/12/79, and revised 7/12/83, since it is considered as a nonimpairing activity.

No traps or corrals will be established within the WSA's and motorized vehicles will be confined to existing roads and ways therefore, no impacts are anticipated to the WSA's.

8) Visual Resource Management

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

9) Archeology

Numerous archeological sites occur within the subject area. To ensure no impact to this resource, an archeologist or a district archeological technician will be required to clear selected areas prior to any ground disturbing activity, including erection of the traps or corrals. Only areas with existing roads or trails will be used.

III. ENVIRONMENTAL IMPACTS

A. Proposed Action

The use of helicopters to capture excess wild horses may result in leppy foals and split bands, as well as injured horses. Incidents like these tend to be increased if the animals are pushed too hard. However, a Bureau official will be present at the gathering site to ensure minimum injury occurs to the horses and that the stipulations are adhered to. The authorized officer will also have a helicopter on site to use in monitoring and supervising the contract. This helicopter will be used with discretion to minimize disturbance of

horses that would make gathering more difficult. However it will be used as needed to assure that the Contractor is complying with the specifications of the contract.

Vegetation may be disturbed as a result of erection of the portable traps and/or corrals. Some soil compaction and vegetation trampling may occur due to the concentration of horses within a one-acre area. The horses may be kept within these facilities for no longer than 3 days unless approved by the authorized officer. Numbers of horses may vary depending on how many are caught in any one area.

Any areas having a threatened or endangered species occurring within the area or archeological artifacts will not be used for trap sites or corral sites. If either of these resources are discovered at any proposed sites, locations will be recorded and turned into the appropriate specialists or area manager.

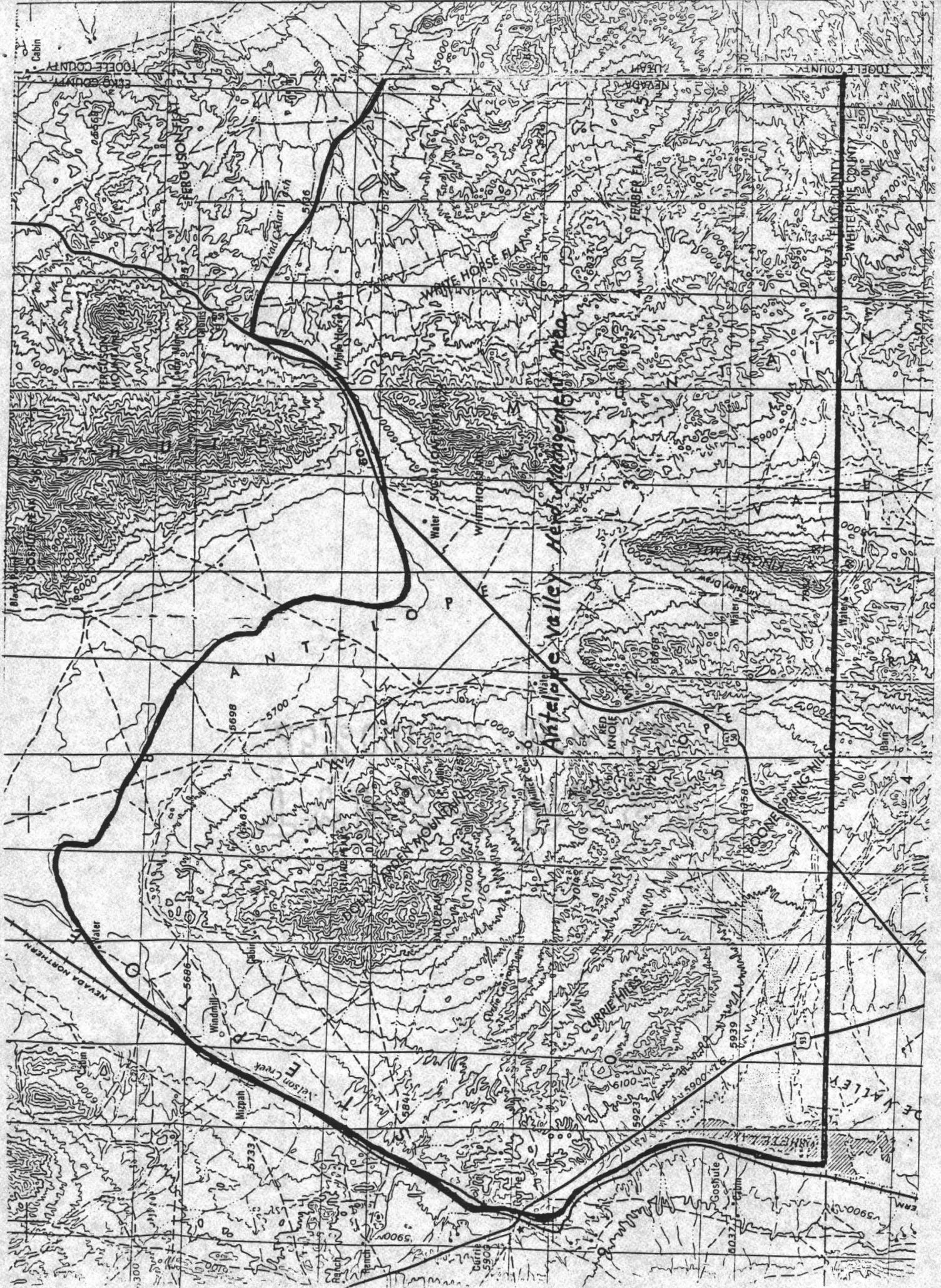
Since the helicopter will not result in any ground disturbing activity, and trap and corral sites are temporary (5 days or less), no significant impacts to any other resources are anticipated.

B. Alternatives

The alternatives have been discussed and determined not to be feasible for the reasons mentioned in I.O.1-3.

V. PERSONS, GROUPS AND AGENCIES CONSULTED

- A. American Horse Protection Assn.
- B. National Mustang Assn.
- C. International Society for the Protection of Wild Horses and Burros
- D. Fund for Animals
- E. U. S. Humane Society
- F. Nevada State Dept. of Agriculture
- G. Animal Protection Institute
- H. American Humane Assoc.
- I. National Wild Horse Assoc.
- J. Wild Horse Organized Assistance
- K. Deborah Allard
- L. Save the Mustangs
- M. American Bashkir Curley Register
- N. Humane Society of Southern Nevada
- O. Nevada Humane Society
- P. Mr. Donald Molde
- Q. U. S. Fish and Wildlife Service
- R. Nevada Federation of Animal Protection Organization
- S. Craig C. Downer
- T. Commission for the Preservation of Wild Horses
- U. Elko District Office
- V. Ely District Office
- W. Nevada Dept. of Wildlife



Antelope Valley Nevada

Cabin

ELKO COUNTY

WHITE PINE COUNTY

HUMBOLDT COUNTY

NEVADA-NORTHERN

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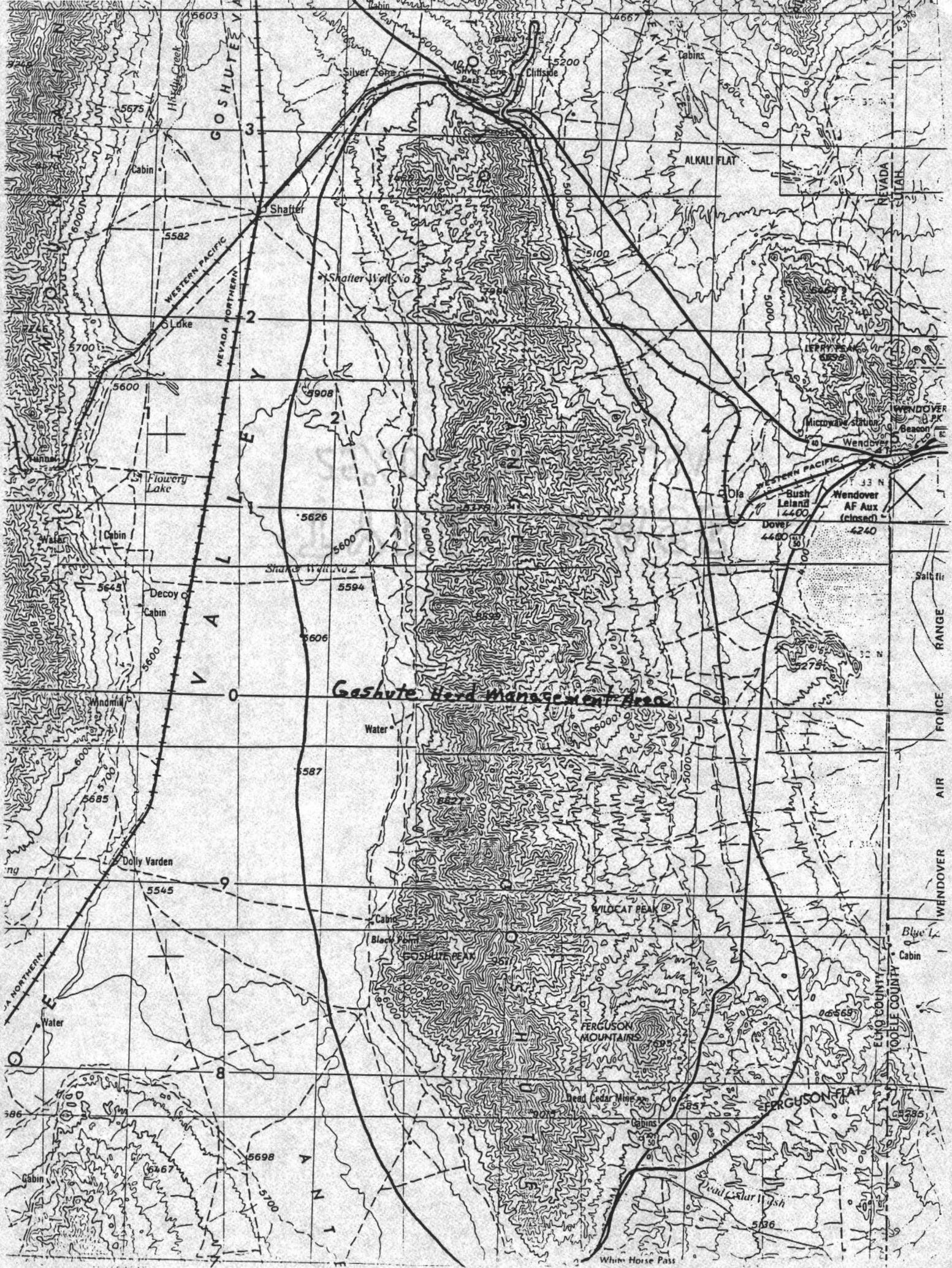
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*Goshute herd management area*

G O S H U T E  
V A L L E Y

NEVADA

SALT FLATS

AIR FORCE

WENDOVER

TOIYABE COUNTY

TOOYABE COUNTY

ALKALI FLAT

WENDOVER

Wendover AF Aux (closed)

WILCAT PEAK

FERGUSON MOUNTAINS

FERGUSON FLAT

Head Cedar Wash

Whim Horse Pass

Cabin

Shafter

Flowers Lake

Cabin

Decoy Cabin

Windmill

Dolly Varden

Water

Cabin

Shafter

Shafter Well No 2

Shafter Well No 2

Water

Cabin

Black Point

Cabin

Cliffside

Shafter Well No 2

Shafter Well No 2

Shafter Well No 2

Shafter Well No 2

Cabin

Cabin

Cabin

Cabins

Cabins

Cabins

Cabins

Cabins

Cabins

Cabins

Cabins

Cabins

Cabins

Cabins

Cabins

Cabins

Cabins

Cabins

LERRY PEAK

Wendover

Bush Leland

Dove

Dove

Dove

Dove

Dove

Dove

Dove

Dove

Dove

Dove

Wendover

Wendover

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SALT FLATS

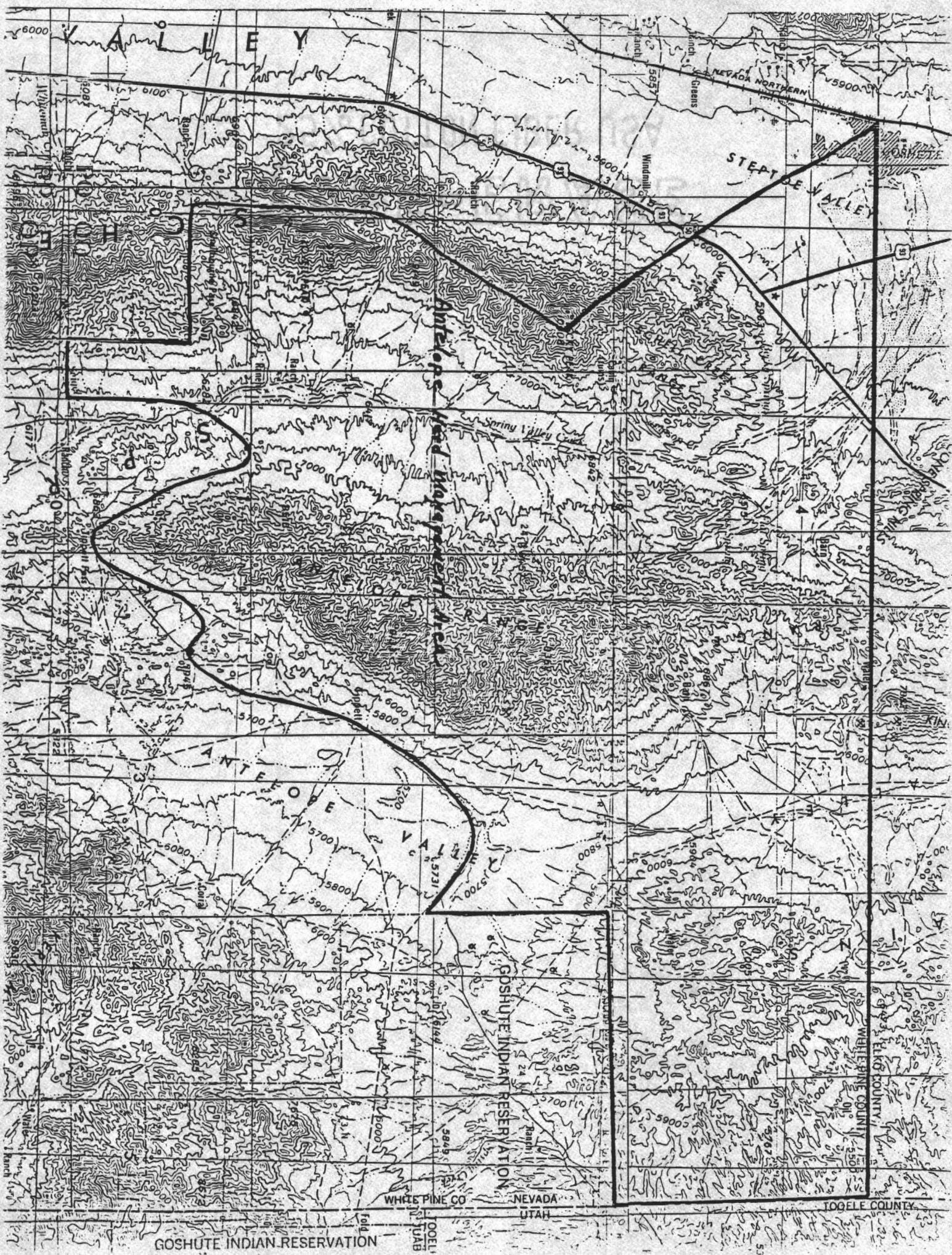
AIR FORCE

WENDOVER

TOIYABE COUNTY

TOOYABE COUNTY

Wendover



6000  
K A N I L E Y

NEVADA NORTHERN  
STEAP VALLEY

ANT E L O P E  
V A L L E Y

GOSHUTE INDIAN RESERVATION

WHITE PINE CO

NEVADA

TOYABE COUNTY

GOSHUTE INDIAN RESERVATION

TOYABE

UTAH

11/9/87

# WHOA!

BOARD OF TRUSTEES  
DAVID R. BELDING  
JACK C. McELWEE  
GORDON W. HARRIS

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

P. O. Box 555  
Reno, Nevada 89504

GERTRUDE BRONN, Honorary  
In Memoriam  
LOUISE C. HARRISON  
VELMA B. JOHNSTON, "Wild Horse Annie"

November 9, 1987

Mr. Rodney Harris, District Manager  
Bureau of Land Management  
P.O. Box 831  
Elko, Nevada 89801

# COPY

Dear Mr. Harris:

Thank you very much for the opportunity to comment on the Drat Gathering Plan and Associated Environmetnal Analysis for the Antelope Valley, Antelope, and Goshute Herd areas.

It is my understanding from Mr. Brown that many more wild horses were counted in the Ely portion of the Antelope, and that these animals are ones thought to have been from the Utah side. What action has BLM taken in conjunction with Utah to protect, manage, and control these wild horses? What happens when these animals return to the Utah side? Please provide pertinent documents between BLM/Nevada and BLM/Utah relating to this subject.

Page 2, correct AMC to AML

WHOA is very concerned, due to recent events, about the location of potential trap sites. We understand these are potential sites, but we would like to be informed in advance of the sites BLM is considering.

Page 3, correct head to read herd.

What are the minimum and maximum temperatures considered safe for the capture of wild horses?

WHOA is very concerned that whomever represents the BLM be able to monitor the area from which the horses are brought, in order to adequately address the mileage issue. It may be 10 miles on the map, but terrain may increase that significantly.

BLM should not allow any capture to proceed is equipment does not meet the specifications.

No mention is made of roping, nor the limits of times that animals may be tied down.

No mention is made that barbed wire fencing may not be a part of any wing, trap, or holding corral.