



United States Department of the Interior



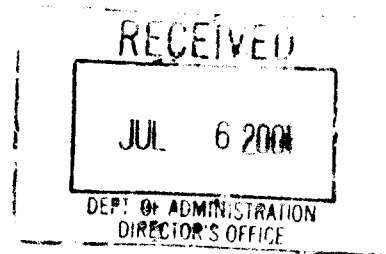
BUREAU OF LAND MANAGEMENT

Surprise Field Office
P.O. Box 460, 602 Cressler Street
Cedarville, CA 96104
(530)279-6101 - (530)279-2171 FAX
www.ca.blm.gov

In Reply Refer To:
4700(CA-370) P

July 3, 2001

CERTIFIED MAIL NO.: 7106 4575 1292 3954 0787
Return Receipt Requested



ADDRESS: MAILING LIST

Full Force And Effect Decision

Gathering of Wild Horses in the ~~Fox-Hog Herd Management~~ Area

Dear Interested Party:

Background

On April 6, 1999, an Appropriate Management Level (AML) of 226 horses was established for the Fox-Hog Herd Management Area, based on environmental assessment #CA-370-99-20. On August 4, 1999, the decision was made to gather the Fox-Hog HMA down to 169 horses. In September of 1999, a gather was conducted in the Fox-Hog HMA and wild horse numbers were reduced to 263, including 73 in the East Summit Pasture of the Bare Allotment.

On May 23, 2001, the Fox-Hog HMA was aerially censused. During the census, 411 horses (344 adult and 67 foals) were counted, including 150 horses (124 adults and 26 foals) in the East Summit Pasture. A follow-up gather was scheduled for October of 2001 to attempt to reach the AML for the herd.

On June 20 and 21 of 2001, the water supply in the East Summit Pasture was inspected. Most of the reservoirs, both creeks, and all but one small spring/seep in the pasture are dry. Significant amounts of water are available at only two sites - a privately owned, low flowing windmill on the west side of the pasture and a spring-fed reservoir on the east side of the pasture (four miles away). Two horses were found dead of thirst at one dry reservoir. More than 27 horses were attempting to get water from the small spring/seep (less than 1 gallon per minute of flow).

On June 21, the livestock operators were notified of the low water conditions and they immediately removed all livestock from the pasture to private lands around Grass Valley.

Decision

It is my decision to gather wild horses from the East Summit Pasture of the Bare Allotment portion of the Fox-Hog HMA commencing on or about July 6, 2001. Approximately 80 horses will be removed from, and 70 horses will remain in, this portion of the HMA.

Animals gathered will be transported to the Litchfield Wild Horse and Burro Holding Facility, where they will be immediately inspected by a veterinarian. Animals in excess of the 70 wild horses to be left on this portion of the HMA will be prepared for adoption or sent to sanctuaries, depending on age and condition.

The removal is planned to begin on approximately July 6, 2001. This is not within the time period normally associated with foaling, generally identified as March 1 through June 30. However, young foals are present in the population to be gathered, and weather during the time of the gather is expected to be hot and dry. Therefore, the following mitigation measures will be implemented:

- 1) Extra care will be taken to ensure young foals are not unduly stressed during the gather operation. Every effort will be made to ensure foals are paired back with their mothers. In the case a foal is not paired back, it will be bottle fed by BLM and/or volunteers until an adopter is found.
- 2) Gathering operations will be limited to that time of day when temperatures are not hot (<90 degrees).
- 3) Due to the shortage of water on the HMA, it is expected that horses will be drought stressed. Therefore, horses will be corralled overnight with water before being shipped to the Litchfield Facility.
- 4) All animals arriving at the Litchfield Facility will be inspected immediately by a veterinarian. If it is determined that there are any problems with the condition of captured animals, gathering operations will be adjusted, as necessary, to mitigate these problems.

Rationale

Northeast California and Northwestern Nevada is currently experiencing severe drought conditions. The 2000-2001 winter period has been the driest on record (records kept since 1895).

Associated with the ongoing drought, a severe shortage of water in the East Summit Pasture portion of the Fox-Hog HMA has been identified. Because of severe drought conditions, it is necessary to conduct the removal as soon as possible. If the gather is delayed until the initially scheduled period, the animals may be in too poor of a condition to gather. This action will relieve some of the grazing pressure on the uplands adjacent to the few remaining water sources in the pasture. It will increase the available water supply for wildlife and the remaining horses in the area. This action is necessary to avoid, what appears to be, a very real potential for additional animals dying in the area.

Full Force and Effect Decision

This decision is issued Full Force and Effect to allow for the immediate removal of wild horses from the East Summit Pasture portion of the Fox-Hog Herd Management Area. The full force and effect determination is in accordance with the regulations at 43 CFR 4770.3(c).

Within 30 days from receipt of this decision you have the right of appeal to the Interior Board of Land Appeals, Office of Hearings and Appeals, 4015 Wilson Boulevard, Arlington, VA 22203, in accordance with the regulations at 43 CFR, Part 4, Subpart E. You are required to provide a Statement of Reasons to the Interior Board of Land Appeals and a copy to the Regional Solicitor's Office, Pacific Region, U.S. Department of the Interior, 2800 Cottage Way, Room E-2753, Sacramento, CA 95825-1890. Please provide this office a copy of your appeal and Statement of Reasons. The appellant has the burden of showing that the decision appealed from is in error.

If you wish to file a petition for a stay (suspension) of this decision during the time that your appeal is being reviewed by the Board, the petition for stay must accompany your appeal and be in accordance with 43 CFR 4.21. Copies of the notice of appeal and petition for a stay must be submitted to the Interior Board of Land Appeals, Office of Hearings and Appeals, 4015 Wilson Boulevard, Arlington, VA 22203, and to the Regional Solicitor, Pacific Southwest Region, U.S. Department of the Interior, 2800 Cottage Way, Room E-2753, Sacramento, CA 95825-1890, at the same time the original documents are filed with this office.

If you request a stay, you have the burden of proof to demonstrate that a stay should be granted. A petition for stay of a decision pending appeals shall show sufficient justification based on the following standards;

- (1) The relative harm to the parties if the stay is granted or denied,
- (2) The likelihood of the appellant's success on the merits,
- (3) The likelihood of immediate and irreparable harm if the stay is not granted, and,
- (4) Whether the public interest favors granting the stay.

Sincerely,



Susan T. Stokke
Surprise Field Manager

8-31-99



United States Department of the Interior

RECEIVED
D.C.N.R.
OFFICE OF THE DIRECTOR

BUREAU OF LAND MANAGEMENT

Surprise Field Office
P.O. Box 460
602 Cressler Street
Cedarville, CA 96104
(530)279-6101 - (530)279-2171 FAX
August 31, 1999

1999 AUG 33 AM 10:54

In Reply Refer To:
4700 (CA-370) P

CERTIFIED MAIL: P 971 468 273
RETURN RECEIPT REQUESTED

Cathy Barcomb
Commission for the Preservation
of Wild Horses
123 West Nye Lane, Suite 248
Carson City, NV 89706-0818

Ren Shone
Delaware Helicopters
Wyoming *Wenay*
Branch

Dear Cathy:

Enclosed is the approved final Capture Plan/Environmental Assessment and Decision Record/Finding of No Significant Impact for the Fox Hog Herd Management Area.

This action constitutes my final decision for the approval of the proposed action as analyzed in the Environmental Assessment and to implement the Fox Hog Herd Management Area gather.

This decision is issued Full Force and Effect to allow for the immediate removal of excess wild horses from the Fox Hog Herd Management Area to reach the established Appropriate Management Level. Immediate removal of wild horses is necessary to restore the range to a thriving natural ecological balance and to avert imminent damage to the range resource. The full force and effect determination is in accordance with the regulations at 43 CFR 4770.3(c).

Within 30 days from receipt of this decision you have the right to appeal to the Interior Board of Land Appeals, Office of Hearings and Appeals, 4015 Wilson Boulevard, Arlington, VA 22203, in accordance with the regulations at 43 CFR, Part 4, Subpart E. You are required to provide a Statement of Reasons to the Interior Board of Land Appeals and a copy to the Regional Solicitor's Office, Pacific Region, U.S. Department of the Interior, 2800 Cottage Way, Room E-2753, Sacramento, CA 95825-1890. Please provide this office a copy of your appeal and Statement of Reasons. The appellant has the burden of showing that the decision appealed from is in error.


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- (1) The relative harm to the parties if the stay is granted or denied,
- (2) The likelihood of the appellant's success on the merits,
- (3) The likelihood of immediate and irreparable harm if the stay is not granted, and,
- (4) Whether the public interest favors granting the stay.

If you have any questions regarding this final decision, please contact Rob Jeffers at: (530) 279-6101.

Sincerely,

A handwritten signature in cursive script that reads "Susan T. Stokke".

Susan T. Stokke
Surprise Field Manager

Enclosures



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Surprise Field Office
P.O. Box 460
602 Cressler Street
Cedarville, CA 96104
(530)279-6101 - (530)279-2171 FAX
June 30, 1999

9-6-30-99

In Reply Refer To:
4700(CA-370)P

Cathy Barcomb
Commission for the Preservation
of Wild Horses
123 West Nye Lane, Suite 248
Carson City, NV 89706-0818

Dear Cathy:

Enclosed for your information and review is a copy of the Fox Hog Wild Horse Capture Plan/Environmental Assessment. *DR*

If you have any comments on these documents, please send them to the Surprise Field Office, at the address above, by **July 23, 1999**. Thank you for your interest in our wild horse and burro program.

Sincerely,

Rob Jeff
for Susan T. Stokke
Surprise Field Manager

Enclosures:
Fox Hog Capture Plan/EA

HELICOPTER CAPTURE PLAN

FOR

WILD HORSES

IN THE

FOX HOG

HERD MANAGEMENT AREA

SURPRISE FIELD OFFICE

Fiscal Year 1999

I. INTRODUCTION

The purpose of this capture plan is to outline the methods and procedures to be used in removing approximately 300 wild horses from the Fox Hog Herd Management Area (CA-263). Additionally, animals that have established home ranges outside the HMA or on private lands will be removed. The proposed action would take the wild horse population to within the population range established for the herd management area. After attaining AML, the populations of wild horses would then be allowed to increase for 3 to 5 years, at which time, it is projected that the populations would be at the upper end of the established population range. At that time, the need for another removal would be determined based upon the actual wild horse populations present.

The proposed removal would begin sometime after August 1, 1999 and would take two to three weeks to complete.

II. GENERAL AREA DESCRIPTION - BACKGROUND DATA

The Fox Hog Herd Management Area is located approximately 40 miles southeast of Cedarville, California. (See attached Map 1). The HMA is bordered by the BLM's Winnemucca District to the east. The HMA consists of approximately 94,000 acres.

The Fox Hog HMA is located in the Tuledad/Home Camp Planning Unit. The Environmental Impact Statement for the Unit was completed in 1978.

Elevations range from 5,300 feet to 8,000 feet, with the majority of the area in the 5,500 to 6,500 foot range.

Vegetation is typical of the Great Basin Community. The area generally contains scattered patches of mountain mahogany and bitterbrush with large areas of big and low sagebrush.

Proposed gathering and removal for FY 1999 will be conducted in the Fox Hog HMA (CA-263).

Appropriate management levels for wild horses in the Fox Hog HMA were established through the analysis of current monitoring data, as documented in the Bare Allotment Evaluation, dated November 19, 1998. The goal is to have wild horses be part of a thriving natural ecological balance among the multiple uses. On April 2, 1999, the Surprise Field Manager issued a Decision Record/FONSI for Environmental Assessment No. CA-370-99-08, which addressed grazing use by livestock and wild horses.

III. JUSTIFICATION

The Wild Free-Roaming Horse and Burro Act of 1971 (Public Law 92-195) as amended, Section 3(b)(2) states "...if an overpopulation exists on a given area of public lands and that action is necessary to remove excess animals, he shall immediately remove excess animals from the range so as to achieve appropriate management levels. Such action shall be taken, in the following order and priority until all excess animals have been removed so as to restore a thriving natural ecological balance to the range, and protect the range from the deterioration associated with the overpopulation."

The Bare Allotment Management Plan Evaluation was completed on November 19, 1998. The Decision Record issued by the Surprise Field Manager on April 2, 1999, established the appropriate management level for the Fox Hog HMA as follows:

<u>HMA Name & Number</u>	<u>Appropriate Management Level (AML)</u>
Fox Hog (CA-263)	226

The above population has been determined to be the maximum level necessary to achieve and maintain a natural thriving ecological balance in each area.

Based on this AML, a population range of 120-226 wild horses has been established for the Fox Hog HMA.

The maximum number for each range is the maximum carrying capacity for wild horses determined from the monitoring data analysis. The minimum number for the range is the approximate level of animals which would be expected to increase to the maximum range figure in four years. In four years, the current population will be determined, and a decision made regarding the need for further removal.

IV. POPULATION AND REMOVAL DATA

The Fox Hog HMA was last gathered in October 1989. The HMA was placed under structured management¹ with the removal. It is estimated that there were 50 horses remaining in the HMA after the removal.

¹A base herd within a herd management area that has been established through the selection and retention of primarily older animals which are well adapted to the specific area.

The current population of wild horses in the Fox-Hog HMA is estimated as follows:

August 1997	August 1999
<u>Census</u>	<u>Projection</u>
343*	469

* Including 72 head found outside the HMA boundary.

Estimates for wild horses are based on the projected average annual increase of 17% and includes foals.

Estimated gathering and removal for the Fox-Hog HMA is as follows:

<u>Est. # to</u> <u>Gather</u>	<u># Return To</u> <u>The Range</u>	<u># to</u> <u>Remove</u>	<u>Total to</u> <u>Remain</u>
400	100	300	169

The above figures for capture and removal are for estimation purposes only and includes those outside the HMA and on private lands. It is recognized that all animals within area cannot be practically captured.

Enough animals will be released to insure that the number of wild horses falls within the established population range. Any base herd horses that have died since the last structuring and removal will be replaced with young animals from those gathered.

It is recognized that it may not be possible to achieve the low range of appropriate management levels by removing only horses five years and younger. The removal of older horses will only be done if they occur outside the HMA, on private lands, or if they can be readily placed through adoption or put into a prison gentling program.

V. METHODS OF REMOVAL

Gathering will be conducted by contract or by the Susanville District wild horse gathering crew.

Gathering of wild horses will be done by using a helicopter to herd the animals to a trap constructed of portable pipe panels. The helicopter will be used in such a manner that bands will remain together. Rate of movement and distance animals travel will be based on terrain, physical barriers, weather and condition of animals. All traps and wings will be constructed in such a manner to facilitate safe, humane capture of animals. At all times, gathering will be under direct supervision of a duly authorized employee of the Bureau of Land Management.

Humane procedures prescribed by the BLM will be used in all gathering and handling operations.

The majority of the wild horses in the HMA will have to be gathered so AML can be achieved by removing only horses five years or younger. This will be done only if practical and at no time will horses be placed under undue stress during the gathering operation. The welfare and humane treatment of the animals will remain the BLM's highest priority.

Captured animals will be shipped to the BLM's Litchfield Wild Horse and Burro Holding Facility in straight deck trucks. Here the animals will be sorted by age and sex. The Litchfield Facility is well set up to provide for humane handling, preparation, and care of captured animals, with a minimum of stress. It is planned to excess only animals of the ages 5 and under. Older animals will be released back to the area from which they were captured. Animals to be released back to the range will be kept separate from the other animals and released back to the HMA as quickly as possible. Younger animals will be released back to the home range as necessary to insure the population of animals falls within the population range established from the appropriate management level.

All publicity, formal public contact and inquiries will be handled through the Surprise Field Manager.

VI. REFERENCE TO ENVIRONMENTAL ASSESSMENT

Environmental Assessment No. CA-370-99-08 was prepared in April, 1999 to analyze impacts associated with establishment of current appropriate management levels. Environmental Assessment No. 370-99-20 was prepared to address impacts associated with the removal operation.

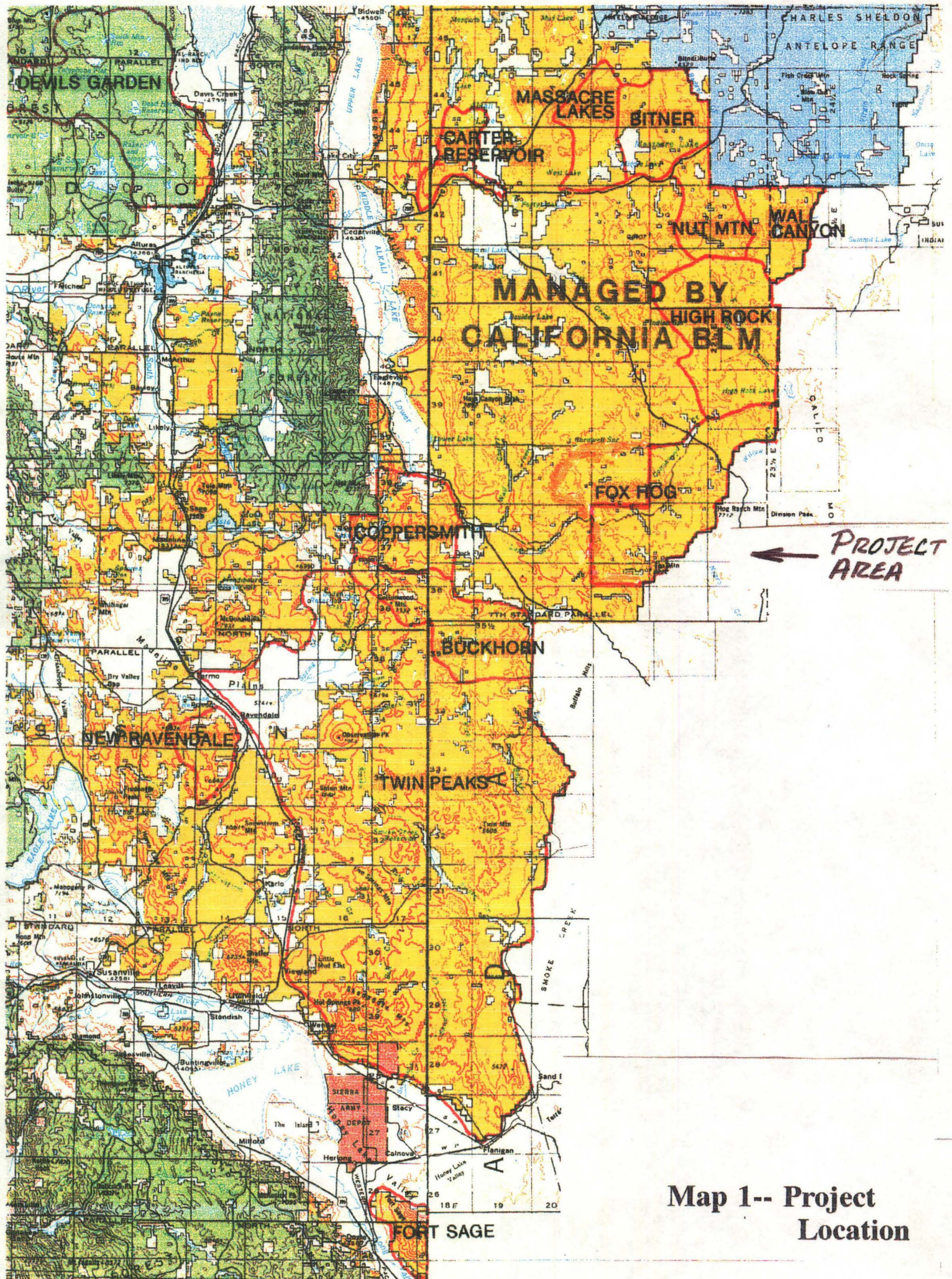
VII. PUBLIC NOTIFICATION

The Helicopter Gathering Plan and associated Environmental Assessment will be sent to all interested parties who have requested a copy of these documents.

Prepared by: _____ Date _____
Natural Resource Specialist

Approved by: _____ Date _____
Manager, Surprise Field Office

Attachment



Map 1-- Project Location

**HELICOPTER CAPTURE PLAN
FOR WILD HORSES IN THE
FOX HOG HERD MANAGEMENT AREA
ENVIRONMENTAL ASSESSMENT NO. CA-370-99-20**

A. Purpose

The purpose of this Environmental Assessment is to analyze the capture technique to be used in the management of wild horses in the Fox Hog Herd Management Area of the Surprise Resource Area. The overriding goal of management is to maintain both a healthy wild horse population and maintain the range in a thriving natural ecological balance and multiple use relationship.

Relationship to Other Environmental Documents

This EA is tiered to the Tuledad/Home Camp Environmental Impact Statement, which analyzed the general ecological impacts of managing rangelands in the planning unit under a program including monitoring and adjustment of wild horses. Additionally, EA No. CA-370-99-08 was finalized in April 1999, which analyzed the impacts of various actions, including the establishment of appropriate management levels for wild horses in the Fox Hog HMA. Both the above documents can be found in the BLM's Surprise Field Office in Cedarville, California.

Relationship to Statutes and Regulations

Both the Code of Federal Regulations (4700) and the Wild Horse and Burro Act of 1971 provide for the removal of excess wild horses.

B. Description of the Proposed Action and Alternatives

Proposed Action

The proposed action is to remove wild horses to implement decisions to achieve appropriate management levels (AML) within the Fox Hog HMA and removal of animals which have established ranges outside existing HMAs or reside on private lands. During an aerial census conducted in August 1997, 72 horses were found outside the HMA boundary. After AMLs have been reached, periodic removals approximately every three or four years will be necessary to maintain the numbers at the level identified by monitoring.

The removal of excess wild horses would be accomplished by the use of a helicopter herding the animals into a trap constructed of portable panels. This operation would be accomplished either by BLM employees, contract, or a combination of both. Horses that are gathered and found to be 5 years or younger will be placed in the

regular adoption program. Horses older than 5 years old gathered inside the HMA will be released back to the range. Animals gathered from outside the HMA or on private lands will either be placed in the adoption program, or released back to the HMA or another HMA, as necessary.

C. Alternatives

No Action

The no action alternative would result in no wild horses being captured, removed, or relocated.

D. Affected Environment

The affected environment is described in the Tuledad/Home Camp Land Use documents, and more specifically in EA No. CA-370-99-08, dated April 2, 1999.

E. Environmental Impacts

Proposed Action

Impacts on Horses (Removal)

Some stress to the wild horses would be associated with the helicopter herding. All the procedures discussed in Methods of Removal of the Capture Plan (V) will be strictly adhered to thus minimizing stress and injuries. Unavoidable impacts in the form of injuries to the wild horses may occur as a result of the capture process. Death loss is not expected to exceed 1% of the animals captured.

In order to minimize the stress and disruption to band structure, the population would be reduced below the maximum level or AML and allowed to increase back to this level over a period of time which is estimated to take about 3 to 4 years. Gathering of horses on a yearly basis is cost prohibitive, stressful to the horses, and makes future captures much more difficult.

Managing horses in a range which can be maintained by the vegetative community with other uses would minimize the stress to individual horses associated with limited forage and space resources. Minimizing the day to day stress would be especially important to the young animals. Managing the population in a manner which maximizes the intervals between capture operations minimizes the stress and injuries associated with removals while maintaining the range in a thriving natural ecological balance.

All animals captured would be shipped to the Litchfield holding facility where they would be sorted as to sex and age. Those found to be too old for the adoption program or unadoptable for some other reason will be returned to the HMA as soon as practical. All adoptable animals would be prepared and made available for placement through the adoption program. Horses captured from areas outside of an HMA would either be placed into the adoption program, released into another HMA, or released back to the HMA of their origin as far as possible from the point of capture, to prevent them from returning to their established range. Releasing the older animals back to the HMA would preserve genotypes that have proven to be most adapted to the area. Release of unadoptable horses to other HMAs would result in the introduction of different genetic material helping to maintain and increase the natural variability of the population. All impacts would be positive.

Other Impacts

Managing horses to achieve a thriving natural ecological balance would have only positive impacts on horses, domestic livestock, vegetation and wildlife. Maintaining the horse population in balance with the other uses would assure the vegetation community would not be over utilized resulting in its degradation. In addition, horses would have access to adequate water and space which are both requirements for a healthy population.

Under the proposed action, there would be a impact on air quality due to the dust from capture operations and the increase in vehicle traffic. This impact would be temporary and diminish when the capture efforts end.

Soils in the vicinity of trap sites would be churned up from trampling. Brush and herbaceous species enclosed in the traps would be trampled and possibly killed.

Riparian areas within the HMA would be expected to improve due to reduced grazing pressure occurring during the hot season months.

All trap sites would have cultural and T&E plant and animal clearances conducted prior to trap construction, therefore, there would be no impact to these values.

The project areas includes a portion of the Little High Rock Wilderness Study Area (No. CA-020-913). In the short term, capture efforts will have negligible impacts to this WSA. There will be a short term impact to solitude resulting from the increase in activity resulting from the capture operations. This will be primarily the presence of a helicopter driving horses and vehicle traffic adjacent to the WSA. Traps or holding pens will not be constructed within the WSA boundary. In the long term, improved vegetation conditions on both the uplands and riparian habitats would be a positive impact on wilderness values.

The proposed action would not adversely impact air quality, ACECs,, recreation, farmlands, floodplains, Native American religious concerns,, wastes, water quality, or wild and scenic rivers.

Removal Alternative No. 1

No Action

This alternative would result in no horses being removed which would result in an increase of their numbers beyond the established AML. The animals would not undergo stress involved with the capture effort nor experience injuries or fatalities. As the population increased the horses would experience stress in searching for adequate forage, water and space. The area would not be in a state of thriving natural ecological balance and degradation of the vegetative resource, including riparian areas, would continue, AML would not be achieved, and horses would remain established outside of the HMA. The BLM would be in violation of existing laws and regulations and the land use plan objectives would not be achieved. This alternative would not meet the objective of maintaining wild horses within the appropriate management level.

The No Action Alternative would not adversely impact air quality, ACECs,, recreation, farmlands, floodplains, Native American religious concerns,, wastes, water quality, wild and scenic rivers, or wilderness study areas.

Mitigation Measures

No adverse impacts are associated with the proposed action or alternative, therefore, mitigation measures are not necessary.

F. Public Participation

This Capture Plan/Environmental Assessment has been send to the following persons, groups and government agencies in order to solicit comments:

Commission for the Preservation of Wild Horses
Nevada Division of Wildlife
North Fork Ranch Company
Simplot Corporation

7-29-99



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Surprise Field Office
P.O. Box 460
602 Cressler Street
Cedarville, CA 96104
(530)279-6101 - (530)279-2171 FAX

July 29, 1999

In Reply Refer To:
4700 (CA-370) P

DECISION RECORD/FONSI Environmental Assessment # CA-370-99-20

HELICOPTER CAPTURE PLAN FOR WILD HORSES IN THE FOX HOG HERD MANAGEMENT AREA

Decision

Based on all the information available to me, it is my decision to implement the Proposed Action of the attached Environmental Assessment # CA-370-99-20. No additional mitigation measures were identified as a result of the environmental analysis.

Rationale

The Proposed Action and No Action alternative were analyzed in Environmental Assessment # CA-370-99-20. The No Action alternative was not chosen as it would not restore a natural thriving ecological balance. Degradation of the vegetative resource, including riparian habitats would continue, and animals would continue inhabiting areas outside the established herd management area.

I have chosen to implement the Proposed Action because this alternative would lead to restoration of a natural thriving ecological balance, resulting in overall positive impacts to both the wild horses and their habitat. Implementation of the Proposed Action is consistent with land use planning goals and objectives and in accordance with applicable laws and regulations.

Finding of No Significant Impact

Based upon the Environmental Assessment # CA-370-99-20, I have determined that implementation of the Proposed Action of the Helicopter Gathering Plan for Wild Horses in the Fox Hog Herd Management Area would not result in any significant impacts on the quality of the human environment. Therefore, an Environmental Impact Statement is not required according to Section 102 (2) (c) of NEPA.

The proposed action is in conformance with the Tulead/ Home Camp Management Framework Plan and would not cause any undue or unnecessary environmental degradation.

Susan T. Stokke
Susan T. Stokke, Surprise Field Office Manager

5/4/99
Date

July 15, 1999

Susan T. Stokke, Surprise Field Manager
BLM-Surprise Field Office
602 Cressler St.
Cedarville, CA 96104

RE:Fox-Hog Wild Horse Capture Plan/EA

Dear Susie,

Thank you for the opportunity to review and comment on the Fox Hog Wild Horse Capture Plan/EA.

I noticed the multiple times you noted that the humane care and treatment of the animals was critical to the capture. We greatly appreciate your concern for their well being. As a suggestion, I noticed that all animals will be transported to Litchfield, sorted, and then older age animals will be returned to the HMA as soon as possible.

Every time an animal is loaded, transported, unloaded, handled, loaded again, transported again, and finally unloaded again, increases the opportunity for injury or even death. Also, this transporting and handling is quite expensive. It would seem more practical, safe, and humane, to age and sex the animals at the trap site and remove to Litchfield only those animals that will permanently be removed from the range. This would also save much time in excessive handling and re-transportation back to the HMA. The less the animals are handled the better. Considering the safety of the animals and your crew is the most important consideration. As I have been on numerous gathers previously, I know this can be done with a minimal of handling and risk. I would ask that you consider this option for this gather and other gathers in the future. If this is not feasible, I would appreciate it if you would let me know why.

If you have any questions or would like to discuss this, please feel free to call me anytime.

Sincerely,

CATHERINE BARCOMB
Administrator