11/9/87

WEOA!

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 Management
Bureau of Land Management
P.O. Box 831
Elko, Nevada 89801

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.





## United States Department of the Interior

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## BUREAU OF LAND MANAGEMENT ELKO DISTRICT OFFICE

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

NOV 1 9 1987

WHOA P.O. Box 555 Reno, NV 89504

Dear Mrs. Lappin:

Thank you for your comments on the Antelope, Antelope Valley and Goshute Capture Plan, and associated Environmental Analysis. My responses to your comments are as follows:

- 1. Concerning the use by wild horses across the Utah line, the Salt Lake District has indicated that they feel such horse use is incidental, and they do not consider that they have a horse herd, so have not provided for it in their planning. They acknowledge that horses do cross the line, especially during dry years, but they consider the horses as Nevada horses. These horses are covered by the Wells RMP--EIS, the Schell MFP-EIS and the Antelope Herd Management Plan, and will be managed accordingly.
- 2. On page 2, "AMC" has been corrected to "AML".
- 3. Attached are maps showing potential trap sites in red. These can vary somewhat depending on horse concentrations at the time of the gather. However, some or all of these sites could be used.
- 4. On page 3, "head" has been corrected to read "herd".
- 5. As a rule of thumb, we do gather horses when the temperature is extremely hot (90 to 100 degrees). We shut down during the heat of the day and just gather mornings and evenings. During extreme cold weather, such as below zero, we would gather during the middle of the day when temperatures would be higher and not early in the morning or late in the evening.
- 6. A helicopter will be available at the roundup site to monitor the contractor's helicopter and assure that contract specifications are followed.
- 7. We will schedule a pre-work conference and inspect the contractor's equipment. If it does not meet specifications, he will not be allowed to start.

- 8. Page 11 of the gathering plan states that roping will be done only with prior approval of the COR, and that no animal will be tied down for more than one hour.
- 9. Pages 11 and 12 of the gathering plan states that traps and holding facilities will be constructed of portable panels, and that wings may not be constructed of barbed wire or other injurious materials.
- 10. The Wells RMP-EIS states that a two percent death loss is expected during roundups. This includes horses destroyed at the direction of the COR because of infirmities and deformities.

Thank you again for your comments.

Sincerely yours,

RODNEY HARRIS

District Manager

Enclosures





