

WHOA
WILD HORSE ORGANIZED ASSISTANCE
P.O. BOX 555
RENO, NEVADA 89504
(702) 851-4817

COPY



... a note from

Dawn Y. Lappin

Mr. James M. Perkins, Asst. Field Manager
Renewable Resources
Bureau of Land Management
HC 33 Box 33500
Ely, NV 89301-9408

Re: 4700 (N-042) Highway 93 Right-of-way/Antelope HMA

Dear Mr. Perkins:

Thank you for the notification of Nevada Department of Transportation's intention to fence portions of Highway 93 and alternate 93. WHOA strongly disagrees with statements made in the cover letter (4700 NV 042), the Administrative Determination, NEPA Review, and Decision Record/Finding of no significant impact; as well as the implication that acceptance of granting an application for a Rights-of-way dismisses your obligation under PL 92-195, NEPA, FLPMA, and the Code of Federal Regulations. We will provide data, gleaned from the BLMs documentation in records that seriously conflict with the casual attempt to alter land use plans through standard operating procedures for a right-of-way.

ARGUMENTS

*43 CFR 4710.1 "Management activities affecting wild horses and burros including the establishment of herd management areas, shall be in accordance with approved land use plans prepared pursuant to part 1600 of this title."

*43 CFR 4710.3-1 "...shall consider the appropriate management level for the herd, the habitat requirements of the animals, the relationship with other uses of the public, and adjacent private lands and the constraints in 4710.4. The authorized officer shall prepare a herd management area plan, which may cover one or more herd management areas."

*Highway 93 has existed since before my Grandfather worked in the local mines and lived in Ely/McGill areas. It has been improved, widened, resurfaced many times and has been the major thoroughfare throughout the planning process. Frequent livestock casualties occurred during that time frame; however we have not been aware of any frequent horse/vehicle encounters. For clarification sake we would like some documentation of the number of wild horses hit on this highway portion. The opportunity existed during the land use

Page two

planning process when the herd management area was delineated, but none of the documents that we have reviewed; The 1983 Draft Egan EIS/RMP, the 1987 Egan ROD, 1987 Antelope HMAP, 1982 Draft Schell EIS/RMP, 1982 Final Schell EIS/RMP, 1983 Schell ROD, or the 1987 Schell RPS, including the Draft Antelope CMP identified the Egan portion of the Antelope HMA boundary as a management constraint, a public safety issue, or an incorrect boundary issue.

*Decision Record 4700-NV042 referenced in 'rationale' the proposed action being in conformance with Egan RMP part II, A, 4, (c) which initially encompasses disposal of land and provides in the same section this quote, "These lands are not in big game or upland game habitat or in wild horse herd use areas," (II, A, 4 (a) 1). and adds in II, A, 4, B (2) the disclosure "...that rights-of-way for public access will be reserved prior to the disposal of lands where necessary." Page 35 II, A, 4, (c) adds "right-of-way grants...are subject to standard approval procedures and a determination of whether the applicants proposed plan is in compliance with applicable Federal and State laws," which we may assume might mean PL92-195.

*Combining the factors of 1) the Egan RMP part II,A,4,a(1) lists Zone 3 for the disposal of up to 24,858 acres, the exact location not cited, but does show that Zone 3 contains that portion of the Antelope HMA which is under discussion in this proposal; and 2) The Stipulated Agreement Reed B Robison v BLM NV-04-90- /Western Farm Credit Bank v BLM NV-04-90-11, September 1991, wherein at 2., agrees: "The Bureau commits to work on wild horse management in the entire Antelope Wild Horse Herd Management Area, i.e., physical boundaries, availability of waters, migration routes, etc." and 3) the lack of authority by the BLM to eliminate a portion of the herd area, served to strengthen the argument that the right-of-way application under the standard operating procedures is a simple way of solving different management issues under a right-of way authority.

DATA THAT DIFFERS FROM RATIONALE PROVIDED

*It is not true that lands proposed to be disposed of under realty and includes the rights-of-way are void of big game, upland game, and wild horses. (See Egan RMP Part II, A,4,a(1) page 33, paragraph 1)

*The statements "In addition, very low wild horse use has occurred east of the highway even with the presence of nearby water and cover," differs with the sentence in the same document "...has supported minimal wild horse use, and contains no free water." Definitely it conflicts with data provided in the 1983 Draft Egan EIS/RMP, the 1987 ROD, the 1987 Antelope HMAP which show census's of numbers up to 44 and in several EA's document captures in Cherry Creek areas in 1975 of 117 horses, and 1978 another 33 horses. All the above cited documents quote "....dimensions of herd use areas and numbers cannot be determined exactly

Page three

because horse populations fluctuate and bands move across use areas, resource areas, and district boundaries." (RMP, page 65)

*Map number 5 of the Antelope HMAP, page 30, depicts the portion to be restricted as critical WINTER USE AREA, where animals can escape from heavy snows; and page 16 informs that migrations are east to west. So this portion the proposal applies to is NOT INSIGNIFICANT! Please refer to the 1985 Draft Antelope CMP, page G111-5, paragraph 5 where it states that wild horses winter in Steptoe Valley on the West side of the Schell Creek Range and are at high elevations during the day and down to the valleys at night."

*The Egan RMP vegetation type map clearly indicates that the proposal will remove 3 vegetation zones, some of which are critical; salt desert, desert shrub, floodplain, basin wild rye, inland saltgrass, and the meadows. The shadscale zone is important wild horse winter habitat. (Antelope HMAP, page 5)

*DRAFT MANAGEMENT CONSIDERATIONS-BLM MANUAL

*Chapter 1

4710-1 B. Objectives

(3) "To establish through BLM's land use planning process, herd management areas...."

C. Management Area Designations

(1) "Herd area boundaries may only be adjusted if it can be shown, based on historical information, that the boundaries were incorrectly identified."

E. Plan Revision

"A LUP should be amended when the analysis of resource data indicates an ecological balance is not being achieved or maintained and a significant change in the AML and amount or location of habitat is proposed.

Chapter 4 Herd Management

A.Landmark Decisions

1. WHAT ALLOWS BLM TO REMOVE HORSES OR BURROS FROM THE PUBLIC RANGE? "Section 3(b) (2) of the Act provides explicit direction regarding the circumstances under which removal of wild horses from the public range is permitted, viz., where there is an overpopulation of wild horses in a given area and removal is necessary in order to restore a thriving ecological balance and prevent a deterioration of the range threatened by that overpopulation." 109 IBLA 126 / Dahl v Clark

E. Other Activities Affecting Wild Horse and Burro Management

"The Authorization of activities which may adversely affect wild horses and burros or alter their habitat shall be in keeping with the intent of the law PL 92-195 and in conformance with an applicable LUP and should be minimized to the greatest extent possible."

Chapter 5 Habitat Management

Page four

C. "All rangeland improvement projects must be constructed and maintained in a manner to allow normal distribution and movement of wild horses and burros and to protect their wild, free-roaming nature in accordance with 43 CFR 4700.0-6(a).....Such improvements could include but not be limited to fences restricting seasonal movements to critical survival areas.....which could lead to the offending animals being removed from the HMA or enclosure eliminating historical use areas of shade, escape cover, or water sources. Consequently, all BLM activities within or adjacent to HMA's should be analyzed to minimize or mitigate adverse impacts to wild horses and burros."

C (2). Structural Improvements ".....Allotment boundary, drift, or highway fences, which may interrupt migration routes, particularly during adverse weather, trap or cripple wild horses, or concentrate livestock use on important habitat should be avoided.....Fingered gates similar to wildlife escape gates along highway right of way or fingered bait trap gates can be effectively installed in the corners of any enclosure.....Fencing within an HMA should be done with care and only after effects are thoroughly analyzed for their impact on free movement of wild horses and burros and whether they continue to fulfill their purpose.....Improvements not meeting these criteria should be modified or removed."

In conclusion, the Draft Antelope Herd Management Area Plan, which is repeated in the Schell and Egan RMP's promised its' participants the following, "...if fences are absolutely necessary they will designed with the wild horses in mind." Your documents considers the elimination of critical winter habitat as insignificant evidently because wild horses are not overgrazing in the area; dismisses casually migrational routes; attempts to over turn resource mangement plans through a right-of-way application; prepares to confine one of the few large herd areas (with minimal internal fencing); concentrate wild horses in an HMA in which the remaining habitat is mostly mountain ranges; forgets that the confinement of horses in the remaining valleys will put them in further conflict with livestock operators; and neglects to mitigate in any way their losses. WHOA can find no authority for the removal of wild horses from a legally designated herd management area given that no monitoring data exists to determine the horses excess. Low or minimal use is not a complaint the BLM should want to argue currently. It is our opinion, that change in a resource management plan requires an amendment and we believe that 43 CFR 4710.1, 4710.3-1 support our belief. We believe the BLM must propose the action, analyze real alternatives, which could include a.) inquire whether an under-the-highway storm drain currently exists in this portion, and if so, whether it could be enlarged, and b.) develop water on the west side. If no reasonable alternatives are found, then at the very least the BLM should seek to mitigate the impacts through an exchange of AUMs from the western portion to the east. It is assumed that livestock will continue to use the east side whether the fence is constructed or not, and indeed gain some from the wild horses removed, therefore they could provide like AUMs in the valleys of the

Page five

Schell and Antelope Ranges.

WHOA submits that we support the fencing of highways for public safety, including our own; we also do not wish to have horses/vehicle encounters. But we do not believe the BLM gave full consideration to the facts and disregarded any impacts to the horses. We believe land use planning gives all interested publics a democratic and legal process in which to address issues such as these. Had this proposal been afforded the attention it deserved, it would have gone a long way towards restoring confidence in the public. Instead the perception continues that BLM will go to great lengths to reduce, eliminate wild horses and burros and provide no assurances that that actions taken today in haste won't seriously affect the wild horses' habitat tomorrow.

Most sincerely,



Dawn Y. Lappin (Mrs.)
Director

cc:

On the Range Committee (NWH&BAB)
Mr. Robert Abbey
AHPA ✓
HSUS
Wild Horse Alliance

RESPONSES TO DAWN LAPPIN COMMENTS
HIGHWAY 93 RIGHT-OF-WAY FENCE

Page 1, 1st paragraph - BLM is not granting an application for rights-of-way, as stated. The two rights-of-way were granted long before passage of the "Wild Free-Roaming Horse and Burro Act of 1971. NDOT has the authority under the existing rights-of-way to maintain highway 93, to include fencing for public safety reasons, without an authorization from BLM (valid existing rights)

Page 2, 2nd paragraph - The Antelope HMA boundary can be adjusted, possible through LUP maintenance, by incorporating that portion of the HMA west of the highway into the Cherry Creek HMA. It would still be part of an HMA. Or, LUP amendment can be done to change the Antelope HMA boundary on the east side of the highway and eliminate the habitat as HMA on the west side. Any LUP maintenance/amendment would occur after the fence is constructed.

Page 1, 3rd paragraph - The NEPA review, AD and letter to the public did consider the appropriate management level for the herd, the habitat requirements of the animals, etc. There has not been a wild horse west of the highway during any census conducted by the Ely District (see attached census memos, 1985 through 1998). Vegetation monitoring west of the highway supports the minimal wild horse use, as documented in the draft Cherry Creek Allotment evaluation. Ground observations over the years have documented wild horses west of the highway on rare occasions only.

Page 1, last paragraph - During the land use planning process and development of the Antelope HMAP, vehicle collisions with wild horses were not a problem and thus were not identified as such. Since the NAFTA has made Highway 93 and interstate highway, traffic has increased, which has caused an increase of livestock/wild horse collisions with vehicles. NDOT has

identified 19 wild horse and 7 cattle collisions with vehicles during the period of September 1993 through August 1998 resulting in 3 personal injuries and fortunately no fatalities (see attached map provided by NDOT). The LUP's and HMAP were all completed prior to this period during which the public safety issue became a concern.

- Page 2, 1st paragraph - BLM is not approving a right-of-way grant for highway 93 and alternate 93. They were approved during the 1940's and 1950's. PL92-195 was not law until 1971. Again, fencing the highways for public safety reasons is nothing more than highway maintenance under the existing rights-of-way for which NDOT does not need BLM approval.
- Page 2, 2nd paragraph - Again, the information presented regarding disposal of lands, referencing zone 3 identified in the Egan RMP is accurate. BLM is not disposing of lands in zone 3; NDOT is only performing maintenance for public safety reasons within the authority of "existing" rights-of-way grants.
- Page 2, 3rd paragraph - Again, BLM is not disposing of lands and the issue raised here, though accurate.
- Page 2, last paragraph - The two statements referred to, from the cover letter and AD (same document), are not in conflict as she states." In addition, very low wild horse use has occurred east of the highway even with the presence of nearby water and cover," refers to the HMA east of the highway along the West Schell bench. The statement "... has supported minimal wild horse use, and contains no free water." refers to the HMA west of the highway toward the bottom of Steptoe Valley. There is also no conflict, as stated, with the 1983 Draft Egan EIS/RMP, the 1987 ROD, the 1987 Antelope HMAP (attached). The review of documents could not locate the referenced "census's of numbers up to 44" in any of these documents.
The 1975 and 1978 captures in the Cherry Creek areas that was referenced to were not from the Antelope HMA. They probably

occurred on the west side of Steptoe Valley, during the claiming period, from the adjacent Cherry Creek HMA. The data presented is not current data. Current data shows only occasional wild horse use in the Antelope HMA west of the highway.

Page 3, 1st paragraph - Map 5 of the 1987 Antelope HMAP (attached), as well as map 5 in the 1992 Antelope HMAP revision (map attached) do not show the area west of highway 93 as critical winter use area. These maps show the area as "general seasonal use winter areas", which means nothing more than valley bottom or bench lands "available" as habitat when winter shows in the mountains drive the horses to lower elevations. There is no "critical winter range" identified in either HMAP. The 1985 Draft Antelope CMP (which was scrapped and never went final) is accurate in the statement regarding critical habitat. But, data shows the wild horses winter mainly on the bench east of the highway, since the bench provides forage, water and cover for the horses. The valley bottom to the west provides only forage. There is limited water and no cover to meet the habitat requirements of the wild horses.

Page 3, 2nd paragraph - It is agreed that the shadescale zone is important wild horse winter habitat; but again, current data shows wild horses rarely use Steptoe Valley west of the highway.

Page 3, "Draft Management Considerations, BLM Manual", Chapter 1 comments -

Again, an LUP amendment/maintenance can be completed, and should be to adjust the HMA boundary to reflect the change with construction of the fence.

Page 3, "A. Landmark Decisions" paragraph -

The statement is correct on removals. Since wild horses do not regularly use the area west of the highway, there

should be no need to remove horses from the west side after fence construction. Wild horses do not normally reside west of the highway. There have gathers to remove excess horses from the Antelope HMA gathers starting 1986 to present, and no horses were west of the highway during any of those removals. It is not anticipated that any wild horses would be west of the highway after fence construction.

Page 3, 1st paragraph - The area west of the highway is not "critical" to the wild horses' survival. It does not provide areas of shade, escape cover, or water sources. The activity was analyzed to minimize and mitigate adverse impacts to wild horses and burros. There will be no impact affecting normal distribution and movement of wild horses. Again, refer to the 1985 - 1998 census maps.

Page 4, 2nd paragraph - Construction of the fence will not interrupt wild horse migration. The habitat west of the highway is not important to the Antelope wild horse herd, according to any current data. The purpose of the fence is to keep wild horses and livestock off the highway; fingered gates could trap them within the right-of-way, thus creating a greater hazard than already exists. The effects of the fence were analyzed and the impacts to wild horses were shown to be negligible.

Page 4, last paragraph - The points raised in this conclusion paragraph have all been responded to above. But to reiterate, the fence will not have any adverse impacts on the wild horses based on the analysis of current data. The habitat west of the highway potential winter use area is rarely used by the horses. Migration routes have not been dismissed; the normal migration is east of the highway from the top of the Schell Creek Range down to the West Schell Bench which provides the bulk of the normal winter habitat. There is no right-of-way application, only maintenance of existing rights-of-way, as related to public safety issues. The fence will not confine one of the few

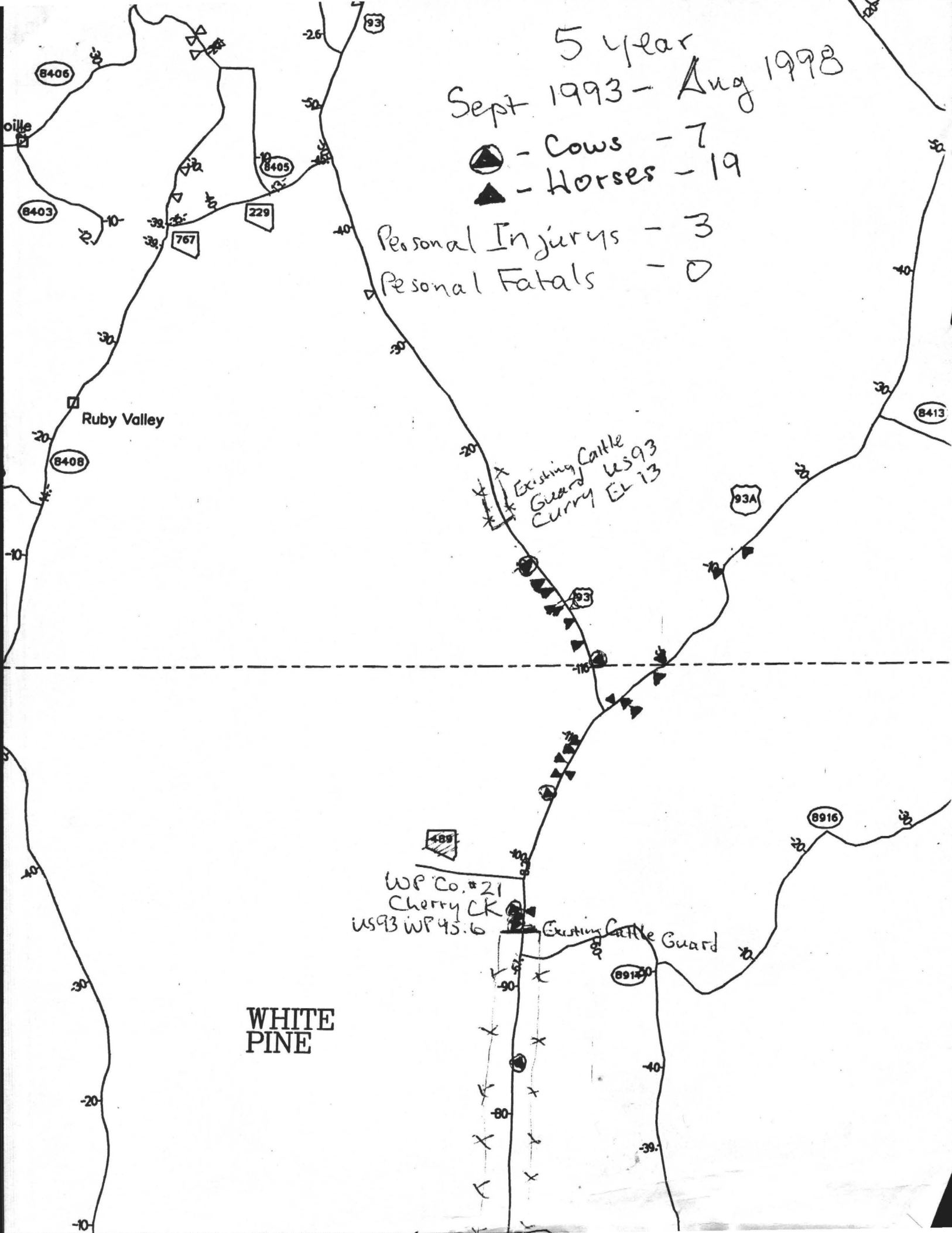
large herd areas, and will not change the normal concentrations of the wild horses from the current situation (see 1985 - 1998 census). The remaining habitat is not mostly mountain ranges; the herd mainly winters to the east in Spring Valley and Antelope Valley which provide the bulk of their winter use area. Current data supports the fence construction as not impacting the normal use and movements of the horses, and building the fence will not put them in further conflict with livestock operators. There are no wild horse losses from fencing the highway to mitigate, other than the loss of a land base in the HMA which is not currently utilized by the horses even without a fence. An amendment to the LUP or at least LUP maintenance is needed for an HMA boundary change as stated, but only to formalize the process and not due to adverse impacts to wild horses.

In summary, NDOT notified the Ely Field Office BLM of their intentions to fence highway 93 for public safety reasons, as a courtesy. There is no authorization required since the project is considered maintenance of existing rights-of-way grants. BLM completed an Administrative Determination (AD) with a cover letter to the wild horse interests, also as a courtesy, to show that the impacts to wild horses would be negligible. Any impacts could be easily mitigated. NEPA analysis is not required for maintenance. Deleting habitat from an HMA does require an LUP amendment, or maintenance as a minimum. BLM did give full consideration to the facts and did not disregard impacts to the horses.

5 year
Sept 1993 - Aug 1998

● - Cows - 7
▲ - Horses - 19

Personal Injuries - 3
Personal Fatals - 0



WHITE
PINE



STATE OF NEVADA
DEPARTMENT OF TRANSPORTATION

1263 S. Stewart Street
Carson City, Nevada 89712

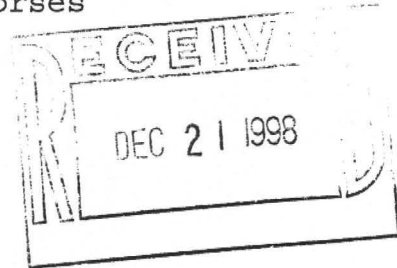
December 16, 1998

BOB MILLER, Governor

TOM STEPHENS, P.E., Director

In Reply Refer to:

Department of Conservation and Natural Resources
Commission for the Preservation of Wild Horses
Carson City, NV 89706-0818



Attn: Catherine Barcomb

Dear Ms. Barcomb:

In response to your request dated December 4, 1998, we have researched our database for all reported traffic crashes involving horses at the following locations for the three year time period of October 1995 thru September 1998.

US 50 - CC/LY County Line to Jct at Silver Springs (US 95A)
SR 431 - US 395 to Virginia City
Hidden Valley District in Reno
Storey County

Enclosed you will find the detailed printout and tables indicating type of crash and contributing factors by severity. We have also included a key to the vehicle directions.

Should you have any questions or require additional information, please contact either Eileen Letizia or Theresa Pacheco at 888-7469.

Sincerely,

A handwritten signature in cursive script that reads "Fred Drees".

Fred Drees
Chief Safety Engineer

FD:TCP
Enclosures

STATE OF NEVADA
 DEPARTMENT OF TRANSPORTATION
 ACCIDENT DETAIL REPORT
 US 50 LY 0.00 THRU 29.44 10-95 THRU 9-98

DATE 12/14/98
 PAGE 1

PSEAC135
 TIME 09:41:17

SERIAL # DATE	OCCURRED ON STREET REFERENCE STREET	DIST F/M	DIR FROM REFERENCE	M/P	ACCIDENT TYPE CONTRIBUTING FACTOR	SEVERITY	*--TOTAL--*		DIRECTION	
							INJ	FATAL	V-1	V-2
000261110 10-23-95	US 50 (FORT CHURCHILL DISTRICT)	0		001.82	ANIMAL ANIMAL IN ROADWAY HORSE	P.D.O.	0	0	03	
000101105 05-27-96	US 50 (FORT CHURCHILL DISTRICT)	0		003.35	ANIMAL ANIMAL IN ROADWAY HORSE	P.D.O.	0	0	03	
000111105 05-27-96	US 50 (FORT CHURCHILL DISTRICT)	0		003.35	ANIMAL ANIMAL IN ROADWAY HORSE	INJ ACC	1	0	03	
000181104 04-24-97	US 50 (FORT CHURCHILL DISTRICT)	0		004.70	ANIMAL ANIMAL IN ROADWAY HORSE	P.D.O.	0	0	04	
000031109 09-15-97	US 50 RAINBOW STREET	0528.0 FEET	EAST OF	012.70	ANIMAL ANIMAL IN ROADWAY HORSE	P.D.O.	0	0	03	
000211108 08-14-98	US 50 (FORT CHURCHILL DISTRICT)	0		012.71	ANIMAL ANIMAL IN ROADWAY HORSE	INJ ACC	1	0	04	
000111103 03-17-97	US 50 (FORT CHURCHILL DISTRICT)	0		014.20	ANIMAL ANIMAL IN ROADWAY HORSE	P.D.O.	0	0	04	
000011103 03-05-98	US 50 (FORT CHURCHILL DISTRICT)	0		014.30	ANIMAL ANIMAL IN ROADWAY HORSE	INJ ACC	1	0	03	
000011104 04-02-96	US 50 (FORT CHURCHILL DISTRICT)	0		018.45	ANIMAL ANIMAL IN ROADWAY HORSE	P.D.O.	0	0	03	
000041107 07-11-98	US 50 (FORT CHURCHILL DISTRICT)	0		019.60	ANIMAL ANIMAL IN ROADWAY HORSE	P.D.O.	0	0	04	

TYPE OF CRASH	PROP DMG	INJURY CRASHES	FATAL CRASHES	TOTAL CRASHES	NO. OF INJ.	NO. OF FAT.
ANIMAL	7	3	0	10	3	0
TOTALS	7	3	0	10	3	0

CONTRIBUTING FACTOR	PROP DMG CRASHES	INJURY CRASHES	FATAL CRASHES	TOTAL CRASHES	NO. OF INJ.	NO. OF FAT.
ANIMAL IN ROADWAY HORSE	7	3	0	10	3	0
TOTALS	7	3	0	10	3	0

STATE OF NEVADA
 DEPARTMENT OF TRANSPORTATION
 ACCIDENT DETAIL REPORT
 HORSE CRASHES IN STOREY COUNTY 10-95 THRU 9-98

DATE 12/14/98
 PAGE 1

PSEAC135
 TIME 09:47:17

SERIAL # DATE	OCCURRED ON STREET REFERENCE STREET	DIST F/M	DIR FROM REFERENCE	M/P	ACCIDENT TYPE CONTRIBUTING FACTOR	SEVERITY	*--TOTAL--*		DIRECTION	
							INJ	FATAL	V-1	V-2
000251508 08-01-98	VIRGINIA CITY RD LOUSETOWN ROAD	1400.0 FEET	NORTH OF	011.32	ANIMAL ANIMAL IN ROADWAY HORSE	P.D.O.	0	0	02	
000031506 06-30-97	VIRGINIA CITY RD (STOREY DISTRICT)	0		011.90	ANIMAL ANIMAL IN ROADWAY HORSE	P.D.O.	0	0	02	
000011505 05-23-97	VIRGINIA CITY RD (STOREY DISTRICT)	0		012.70	ANIMAL ANIMAL IN ROADWAY HORSE	INJ ACC	1	0	01	
000281501 01-17-97	VIRGINIA CITY RD (STOREY DISTRICT)	0		013.40	RAN OFF RDWY-FIXED OBJ ANIMAL IN ROADWAY HORSE	P.D.O.	0	0	01	
000011512 12-05-95	VIRGINIA CITY RD (STOREY DISTRICT)	0		013.81	ANIMAL ANIMAL IN ROADWAY HORSE	P.D.O.	0	0	01	
000031503 03-22-97	VIRGINIA CITY RD (STOREY DISTRICT)	0		014.20	ANIMAL ANIMAL IN ROADWAY HORSE	P.D.O.	0	0	02	
000011508 08-29-97	VIRGINIA CITY RD (STOREY DISTRICT)	0		014.20	ANIMAL ANIMAL IN ROADWAY HORSE	INJ ACC	3	0	02	
000251509 09-01-98	VIRGINIA CITY RD CARTWRIGHT ROAD	0400.0 FEET	SOUTH OF	014.20	ANIMAL ANIMAL IN ROADWAY HORSE	P.D.O.	0	0	02	
000331506 06-05-96	VIRGINIA CITY RD CARTWRIGHT ROAD	0300.0 FEET	SOUTH OF	014.22	ANIMAL ANIMAL IN ROADWAY HORSE	P.D.O.	0	0	02	
000081509 09-26-97	VIRGINIA CITY RD (STOREY DISTRICT)	0		014.28	ANIMAL ANIMAL IN ROADWAY HORSE	P.D.O.	0	0	02	
000051506 06-26-96	VIRGINIA CITY RD (STOREY DISTRICT)	0		014.51	ANIMAL ANIMAL IN ROADWAY HORSE	P.D.O.	0	0	01	
000041506 06-26-96	VIRGINIA CITY RD (STOREY DISTRICT)	0		014.51	ANIMAL ANIMAL IN ROADWAY HORSE	INJ ACC	1	0	02	

HORSE CRASHES IN STOREY COUNTY 10-95 THRU 9-98
 CRASH TYPE BY SEVERITY

RUN: 12/14/98

TYPE OF CRASH	PROP DMG CRASHES	INJURY CRASHES	FATAL CRASHES	TOTAL CRASHES	NO. OF INJ.	NO. OF FAT.
NORMAL	8	3	0	11	5	0
RAN OFF RDWY--FIXED OBJ	1	0	0	1	0	0
TOTALS	9	3	0	12	5	0

HORSE CRASHES IN STOREY COUNTY 10-95 THRU 9-98
CONTRIBUTING FACTORS BY SEVERITY

RUN: 12/14/98

CONTRIBUTING FACTOR	PROP DMG CRASHES	INJURY CRASHES	FATAL CRASHES	TOTAL CRASHES	NO. OF INJ.	NO. OF FAT.
ANIMAL IN ROADWAY HORSE	9	3	0	12	5	0
TOTALS	9	3	0	12	5	0

STATE OF NEVADA
 DEPARTMENT OF TRANSPORTATION
 ACCIDENT DETAIL REPORT
 HORSE CRASHES IN HIDDEN VALLEY DISTRICT 10-95 THRU

DATE 12/14/98
 PAGE 1

AC135
 T) 09:45:47

AL # OCCURRED ON STREET
 DATE REFERENCE STREET
 000231610 HIDDEN VALLEY DR (C)
 10-16-95 PELHAM DR. (C)

DIST F/M	DIR FROM REFERENCE	M/P	ACCIDENT TYPE CONTRIBUTING FACTOR	SEVERITY	*--TOTAL--*		DIRECTION	
					INJ	FATAL	V-1	V-2
0030.0 FEET	SOUTH OF	.	ANIMAL ANIMAL IN ROADWAY HORSE	P.D.O.	0	0	02	

HORSE CRASHES IN HIDDEN VALLEY DISTRICT 10-95 THRU 9-98
CRASH TYPE BY SEVERITY

RUN: 12/14/98

TYPE OF CRASH	PROP DMG CRASHES	INJURY CRASHES	FATAL CRASHES	TOTAL CRASHES	NO. OF INJ.	NO. OF FAT.
ANIMAL	1	0	0	1	0	0
TOTALS	1	0	0	1	0	0

HORSE CRASHES IN HIDDEN VALLEY DISTRICT 10-95 THRU 9-98
CONTRIBUTING FACTORS BY SEVERITY

RUN: 12/14/98

CONTRIBUTING FACTOR	PROP DMG CRASHES	INJURY CRASHES	FATAL CRASHES	TOTAL CRASHES	NO. OF INJ.	NO. OF FAT.
ANIMAL IN ROADWAY HORSE	1	0	0	1	0	0
TOTALS	1	0	0	1	0	0

TYPE OF CRASH	PROP DMG CRASHES	INJURY CRASHES	FATAL CRASHES	TOTAL CRASHES	NO. OF INJ.	NO. OF FAT.
ANIMAL	11	4	0	15	6	0
RAN OFF RDWY-FIXED OBJ	1	0	0	1	0	0
TOTALS	12	4	0	16	6	0

SR 431 FROM ST 9.00 THRU WA 22.17 HORSE CRASHES 10-95 THRU 9-98
 CONTRIBUTING FACTORS BY SEVERITY

RUN: 12/14/98

CONTRIBUTING FACTOR	PROP DMG CRASHES	INJURY CRASHES	FATAL CRASHES	TOTAL CRASHES	NO. OF INJ.	NO. OF FAT.
ANIMAL IN ROADWAY HORSE	12	4	0	16	6	0
TOTALS	12	4	0	16	6	0

STATE OF NEVADA
 DEPARTMENT OF TRANSPORTATION
 ACCIDENT DETAIL REPORT
 SR 431 FROM ST 9.00 THRU WA 22.17 HORSE CRASHES 10

DATE 12/14/98
 PAGE 1

PSEAC135
 TIME 11:01:25

SERIAL # DATE	OCCURRED ON STREET REFERENCE STREET	DIST F/M	DIR FROM REFERENCE	M/P	ACCIDENT TYPE CONTRIBUTING FACTOR	SEVERITY	*---TOTAL---		DIRECTION	
							INJ	FATAL	V-1	V-2
000251508 08-01-98	VIRGINIA CITY RD LOUSETOWN ROAD	1400.0 FEET	NORTH OF	011.32	ANIMAL ANIMAL IN ROADWAY HORSE	P.D.O.	0	0	02	
000031506 06-30-97	VIRGINIA CITY RD (STOREY DISTRICT)	0		011.90	ANIMAL ANIMAL IN ROADWAY HORSE	P.D.O.	0	0	02	
000011505 05-23-97	VIRGINIA CITY RD (STOREY DISTRICT)	0		012.70	ANIMAL ANIMAL IN ROADWAY HORSE	INJ ACC	1	0	01	
000281501 01-17-97	VIRGINIA CITY RD (STOREY DISTRICT)	0		013.40	RAN OFF RDWY--FIXED OBJ ANIMAL IN ROADWAY HORSE	P.D.O.	0	0	01	
000011512 12-05-95	VIRGINIA CITY RD (STOREY DISTRICT)	0		013.81	ANIMAL ANIMAL IN ROADWAY HORSE	P.D.O.	0	0	01	
000031503 03-22-97	VIRGINIA CITY RD (STOREY DISTRICT)	0		014.20	ANIMAL ANIMAL IN ROADWAY HORSE	P.D.O.	0	0	02	
000011508 08-29-97	VIRGINIA CITY RD (STOREY DISTRICT)	0		014.20	ANIMAL ANIMAL IN ROADWAY HORSE	INJ ACC	3	0	02	
000251509 09-01-98	VIRGINIA CITY RD CARTWRIGHT ROAD	0400.0 FEET	SOUTH OF	014.20	ANIMAL ANIMAL IN ROADWAY HORSE	P.D.O.	0	0	02	
000331506 06-05-96	VIRGINIA CITY RD CARTWRIGHT ROAD	0300.0 FEET	SOUTH OF	014.22	ANIMAL ANIMAL IN ROADWAY HORSE	P.D.O.	0	0	02	
000081509 09-26-97	VIRGINIA CITY RD (STOREY DISTRICT)	0		014.28	ANIMAL ANIMAL IN ROADWAY HORSE	P.D.O.	0	0	02	
000041506 06-26-96	VIRGINIA CITY RD (STOREY DISTRICT)	0		014.51	ANIMAL ANIMAL IN ROADWAY HORSE	INJ ACC	1	0	02	
000051506 06-26-96	VIRGINIA CITY RD (STOREY DISTRICT)	0		014.51	ANIMAL ANIMAL IN ROADWAY HORSE	P.D.O.	0	0	01	
005811606 06-15-97	GEIGER GRADE RD (NEW WASHOE CITY DISTRICT)	0		020.60	ANIMAL ANIMAL IN ROADWAY HORSE	P.D.O.	0	0	01	
006221606 06-27-96	GEIGER GRADE RD (NEW WASHOE CITY DISTRICT)	0		020.98	ANIMAL ANIMAL IN ROADWAY HORSE	P.D.O.	0	0	02	
006801610 10-29-97	GEIGER GRADE RD MIRA LOMA DRIVE	0064.0 FEET	SOUTH OF	021.17	ANIMAL ANIMAL IN ROADWAY HORSE	INJ ACC	1	0	01	
006821610 10-29-97	GEIGER GRADE RD MIRA LOMA DRIVE	0064.0 FEET	SOUTH OF	021.17	ANIMAL ANIMAL IN ROADWAY HORSE	P.D.O.	0	0	01	