

9-10-82

4700
(N-933)
(N-931.5)

SEP 10 1982

MEMORANDUM

To: District Manager, Las Vegas
From: State Director, Nevada
Subject: Nevada Wild Horse Range and USAF Tactical Fighters Weapons Center
Range Complex/Capture/Management Plans and EAR

Enclosed are the subject documents pertaining to wild horse management on the Nevada Wild Horse Range (NWR). These documents are being returned for your action in correcting the problem outlined below:

The number of animals to be removed, the number of animals censused and the number of animals to remain after gathering need to be consistent between all three documents. Further, the estimated number of animals inhabiting the NWR should be based on the most recent aerial census and should not be inflated to account for uncounted animals unless a specific population estimate adjustment factor has been developed for the NWR.

In addition to the above, since all three documents are interrelated, it is strongly recommended that you consider the following in a redraft of the Nevada Wild Horse Range HMAP and EAR.

1. Part IV A of the NWR EAR identifies removal of vegetation by wild horses as the factor causing dust pollution and resulting optical interference on the NWR. The basis for this conclusion is identified in the Herd Management Area Plan (HMAP).

Overgrazing, when it occurs, generally results in a reduction of vegetation cover only when at its extreme. While overgrazing may have altered vegetation composition on the NWR, total ground cover has probably changed very little. Exceptions may have occurred on extreme concentration areas but while concentration areas may contribute to dust pollution, they would probably play a minor role. For example, dust pollution has not been identified as a problem in Stone Cabin Valley, North of the NWR, where concentrations of herbivores exceed those on

the NWHR. You should assure that the factor causing visibility problems on the NWHR is vegetation removal by wild horses and not other causative agents or a combination of agents e.g., natural geologic erosion, disturbed areas such as roads or bomb craters or other particulate matter. If the USAF or Sandia has data substantiating an increase in dust caused by wild horses, this information should be incorporated into the plan and EAR.

2. Part IV B of the NWHR EAR identifies vehicle/horse collisions as a problem on the range. If these collisions are a problem, documentation of their frequency and damage should be provided by the USAF and Sandia. In addition, further analysis is suggested to identify when these collisions are occurring and the speed capacity of the roads where collisions are occurring. Increased driver awareness may be a more appropriate mitigating measure than wild horse removal. Further, if the intent of the capture plan is to alleviate such collisions, the location and number of animals to be removed to accomplish that end should be identified.

3. Part IV D of the NWHR EAR identifies a purported issue or controversy by wild horse advocates and those who oppose encroachment of wild horses. As written, we do not understand what this section means. Further, we wonder what relation an issue of controversy regarding wild horses has to the Affected Environment.

4. Part V A(1)(a) of the NWHR EAR should have a verification of the problem before the items discussed are presented as positive impacts.

5. Part V A(1)(e) of the EAR is contradictory to the HMAP, which states that most wild horses on the NWHR are in good condition.

6. Part V A(1)(f) of the EAR as it relates to aesthetic aspects of WH&B removal is not applicable to the NWHR since the public is excluded from the area.

7. Part V D(5)(b) of the EAR needs correction. The NWHR is an established refuge for wild horses. It was established in 1962 by the Department of Interior in cooperation with the Department of Defense.

In addition to the above, please insure that the Capture Plan and EAR receive appropriate public involvement in accordance with NSO Instruction Memorandum No. 80-15, Change 2. Further, it is strongly recommended that you redraft the NWHR Wild Horse Herd Management Area Plan. As presently written, this plan is primarily a justification for removing wild horses. The plan lacks specificity, coordination between sections, and a logical thought process for development of management actions. The plan also contains statements which are unsupported by factual data. We suggest that more emphasis be given to the removal of wild horses for the benefit of bighorn sheep. This does not mean that you should present unsubstantiated conflicts as existing on the NWHR, but should discuss the fact that bighorn sheep are listed as a sensitive species and that biologists

have for many years held the professional opinion that burros and horses are detrimental to bighorn sheep. In other words, BLM is giving the benefit of doubt to the sheep by removing wild horses. Finally, the HMAP needs to be closely coordinated with wild horse interest groups to assure that their concerns are addressed. I realize that guidance in the preparation of HMAPs is extremely limited in BLM. However, if you would like assistance in preparing a HMAP which addresses the concerns touched upon briefly above, please feel free to contact NSO (930).

/s/ Roger J. McCormack
Associate

3 Enclosures

- Encl. 1 - Memo dated July 1, 1982
- Encl. 2 - Wild Horse Herd Management Area Plan
- Encl. 3 - Wild Horse Removal Plan

MFrei/SGearhart/jw
8-12-82
8/13/1982:VMc
08/25/1982:VMc
08/31/1982:VMc
09/09/1982:VMc