

Gold Butte

11-20-97



~~November 20, 1997~~

Mr. Marvin D. Morgan
Stateline Resource Area
Bureau of Land Management
4765 Vegas Drive
Las Vegas, Nevada 89126

Subject: Gold Butte Wild Burro Gather/EA

Dear Mr. Morgan:

The Nevada Commission for the Preservation of Wild Horses appreciates this opportunity to review and comment on the proposed decision to gather wild burros within the Gold Butte Herd Area. The appropriate management level for this herd must be established by decision that is consistent with the IBLA Decision of 1989. In our file review of this herd, we could not find a proposed or final multiple use decision associated with the preliminary Gold Butte Allotment Evaluation. Therefore, it is impossible for us to determine how the appropriate management level was established.

While the Commission supports necessary adjustments in wild horse/burro populations to achieve a thriving natural ecological balance on public land, we must insist that proper data and analysis comply with federal regulation and law.

Since all data to determine the appropriate management level was collected prior to 1989, recent changes in livestock numbers and management could affect the AML. It is our understanding, that livestock were not managed under ephemeral regulations and that the new permittee, Nature Conservancy, has retired a major livestock permit within the herd area. These changes have obviously changed livestock use and made more forage available to wild burros since the 1989 allotment evaluation. We would appreciate full consideration of these facts in determining an appropriate management level for this herd.

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The Strategic Plan for Wild Horses/Burros sets the criteria for animal removal. Removing all adoptable animals will restructure the age and sex composition of this herd. This issue was not address in the environmental assessment.

We would appreciate your consideration of these issues prior to your proposed and final decisions affecting the Gold Butte Wild Burro Herd. If this draft document is considered a proposed decision, please consider our concerns as a formal protest.

Sincerely,

Catherine Barcomb
Executive Director