



COMMISSION FOR THE  
PRESERVATION OF WILD HORSES

Stewart Facility  
Capitol Complex  
Carson City, Nevada 89710  
(702) 687-5589

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Las Vegas, Nevada

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Paula S. Askew  
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Dawn Lappin  
Reno, Nevada

October 30, 1991

Curtis Tucker, Area Manager  
BLM-Caliente Resource Area  
P.O. Box 237  
Caliente, Nevada 89008

Dear Mr. Tucker,

Thank you for the opportunity to comment on the draft Environmental Assessment and Gather Plan for the Nellis Air Force Range Wild Horse Removal.

According to BLM Instruction Memorandum #NV-85-345, February 20, 1986, documents are to be distributed for public review for a minimum of 30 days. The date on this document is October 9, 1991. Our office received it on October 16, 1991, and it was requested to be due on October 23, 1991. That is actually 5 business days to respond. As per our conversation, you would appreciate the comments as soon as is practicable but the Commission has until November 8, 1991, to respond.

We have a few questions and concerns but in essence we support the removal of excess animals from the Nellis Range.

From our first hand review in the summer of 1991, we realize the degradation of the range, the poor condition of the wild horses on that range, and the severe shortage of waters. We hazard to imagine another year of a drought in Nevada and the effects to those horses.

Our main concern is your census numbers. In your removal plan you state "The September 1991 post capture census recorded 5,219 wild horses." This statement is grossly misleading and incorrect when in fact you actually counted 3,552 wild horses and 91 burros. Could you please explain to us why you have used an estimated population abusing the confidence limit? By saying your confidence limit is plus or minus 1,667 it could place your population anywhere from 3,552 to 6,886 wild horses. That's quite a margin. What concerns us greatly is that you intend to continue gathering horses until you reach an AML of 1,000 horses. Unless you have an accurate count how will you know when to stop?

We support the current gather of no more than 2,552 horses which is the actual count of 3,552 minus the 1,000 AML. We protest the removal of any animals over that number unless supported by monitoring data to show actual census and monitoring to establish AML at that time.

On page six of the removal plan you state that "A post gather census will be conducted to ensure that the identified

feasible, water development projects could require a minimum of 3 years before implementation. Therefore, this was not considered as a viable alternative at this time because it would not resolve the resource issues in a timely manner." Repair to those areas would certainly improve conditions and supply for the horses use as well as improve distribution. Under the Affected Environment section (page 14 of the EA), you refer to a lack of water however an alternative wasn't considered for repair and/or development of waters. How would those developments affect wild horse numbers? How would future adjustments to wild horse numbers be affected? We recommend that you address this in your final EA and Removal Plan.

Will your District be regularly monitoring the existing waters? If so, please provide the Commission with the ongoing results as you are collecting the data.

We are also wondering why you would ship horses to PVC or to Kingman? What purpose are you trying to achieve by shipping to both locations?

In conclusion, on page 7 of the Removal Plan and Page 5 of the EA you mention that "mares with foals too young to be shipped" will be released back on the range. What age are you determining for the foals to be too young to be shipped?

We would like to request a written response to our questions.

If you have any questions on any of the above, please feel free to call.

Sincerely,



CATHERINE BARCOMB  
Executive Director

# W H O A

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

## BOARD OF TRUSTEES

DAVID R. BELDING  
JACK C. McELWEE  
GORDON W. HARRIS

### In Memoriam

LOUISE C. HARRISON  
VELMA B. JOHNSTON, "Wild Horse Annie"  
GERTRUDE BRONN

10/30/91

October 30, 1991

Curtis Tucker, Area Manager  
BLM-Caliente Resource Area  
P.O. Box 237  
Caliente, Nevada 89008

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We support the current gather of no more than 2,552 horses which is the actual count of 3,552 minus the 1,000 AML. We protest the removal of any animals over that number unless supported by monitoring data to show actual census and monitoring to establish AML at that time.

On page six of the removal plan you state that "A post gather census will be conducted to ensure that the identified

Curtis Tucker, Area Manager  
October 30, 1991  
Page 2

population numbers remain after the gather is complete." We would hope that the Bureau could provide and report an actual census not a number that is "estimated." We would like to suggest that in your final document that you reflect the fact that those numbers you have quoted are estimates of the population not actual as you would have the reader believe. Until the ROD is issued on our boundary protest, we assume that you are monitoring the entire range, is that correct?

In your discussions regarding waters on the Nellis Range, you have not approached the subject of developing waters or repairing the existing waters. We have seen that range and the water sources that are currently available for horses are in severely degraded condition. In your EA you state "If determined feasible, water development projects could require a minimum of 3 years before implementation. Therefore, this was not considered as a viable alternative at this time because it would not resolve the resource issues in a timely manner." Repair to those areas would certainly improve conditions and supply for the horses use as well as improve distribution. Under the Affected Environment section (page 14 of the EA), you refer to a lack of water however an alternative wasn't considered for repair and/or development of waters. How would those developments affect wild horse numbers? How would future adjustments to wild horse numbers be affected? We recommend that you address this in your final EA and Removal Plan.

Will your District be regularly monitoring the existing waters? If so, please provide WHOA with the ongoing results as you are collecting the data.


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If you have any questions on any of the above, please feel free to call.

Sincerely,



DAWN Y. LAPPIN  
Director

BOB MILLER  
Governor

STATE OF NEVADA

10/30/91  
CATHERINE BARCOMB  
Executive Director



**COMMISSION FOR THE  
PRESERVATION OF WILD HORSES**

Stewart Facility  
Capitol Complex  
Carson City, Nevada 89710  
(702) 687-5589  
October 30, 1991

**COMMISSIONERS**

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Carson City, Nevada  
Steven Fulstone  
Smith Valley, Nevada  
Dawn Lappin  
Reno, Nevada

Colonel Duncan, Commander  
Nellis Air Force Base  
554 RS  
Las Vegas, Nevada 89191

Dear Colonel Duncan,

The Bureau of Land Management is anticipating gathering wild horses from the Nellis Range in the upcoming months.

We have supported this gather with minor provisions. A concern that we have is directly related to the military and that participation in the gather. At the previous gather during the summer of 1991, some animals had to be destroyed. We realize for security reasons that only personnel from ASI may discharge firearms for the destruction of animals.

We are concerned that these personnel are not properly trained for the "humane" destruction of horses. During the previous gather (1991), the animals literally "had their heads blown off" shotgun style, according to personnel at the gather site. I realize that they probably never felt it, but this does not fall under "humane" destruction criteria.

The Bureau of Land Management has veterinarians available for instruction of personnel that will be performing these tasks. If they are not available for your use prior to that gather, the Commission could possibly arrange for such instruction. We feel that in some cases it is necessary to destroy animals at a gather but that it should be as humane as possible. We would like to recommend that personnel from ASI that will be performing these tasks be thoroughly trained along these lines before they are permitted to destroy any horses.

If you have any questions, or if we may be of service to you, please don't hesitate to call.

Sincerely,

A handwritten signature in cursive script that reads "Catherine Barcomb".

CATHERINE BARCOMB  
Executive Director

cc: Billy Templeton, State Director  
BLM-Nevada State Office

Curtis Tucker, Area Manager  
Tonopah Resource Area

Nellis

11-27-91



DEPARTMENT OF THE AIR FORCE

HEADQUARTERS 554TH RANGE SQUADRON (TAC)  
NELLIS AIR FORCE BASE NV 89191-5000

NOV 27 1991

OFFICE OF THE COMMANDER

SUBJECT: Wild Horse Management Plan

TO: Ms Catherine Barcomb  
Executive Director, State of Nevada  
Commission for the Preservation  
of Wild Horses  
Stewart Facility, Capital Complex  
Carson City NV 89710

1. Reference your 30 October 1991 letter concerning the euthanasia of injured or sick horses during roundups and the proper procedure to effect a more humane destruction.
2. We reviewed contracted support with Advance Security Incorporated (ASI) and have determined the contractor is following procedures approved by the Bureau of Land Management (BLM). A cooperative agreement for handling injured wild horses was agreed upon by representatives from BLM, Sandia Corporation, Department of Energy (DOE), ASI, and 554th Range Squadron, effective 26 April 1989. From our records and recall, either BLM was present or an incident report was completed during all cases of euthanasia. The method used to down a horse was found acceptable by BLM as both cost effective and timely, resulting in minimal pain to the animal.
3. If you feel a different method is warranted, please direct your request in writing to BLM. As managers of the wild horse program, they would need to change the established plan. 554th Range Squadron will ensure contracted security abides by the BLM agreement.
4. My point of contact for the Horse Management Plan is Captain Bert Pridham, 554th Range Squadron, Facilities Branch, telephone (702) 652-3650.

A handwritten signature in black ink, appearing to read "Ralph E. Duncan".

RALPH E. DUNCAN  
Colonel, USAF  
Commander

cc: BLM-NV State Director  
BLM-Caliente/Las Vegas  
USAF/DOE Liaison Office  
DOE TTRSO  
Sandia Corp-TTR  
FWC/EM

*Readiness is our Profession*