

9/6/89

IN REPLY REFER TO:



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

CALIENTE RESOURCE AREA

P.O. Box 237

Caliente, Nevada 89008

4700
(NV-055.14)

(702) 726-3141

SEP 06 1989

Dear Reviewer,

Enclosed is the Caliente gathering plan environmental assessment for your comment and review. Please submit any comments you may have to me at the above address by October 1, 1989.

Sincerely,

Curtis G. Tucker

Curtis G. Tucker
Area Manager

*have you established
horses have ↑ permanent
new home ranges
same animals*

*Adjusting herd population
without monitoring*

*Why/when Delamar declared
horse free?*

ROD?

push back 2 1/4
close gates

*adjustments in #'s are to based on
monitoring - where is data to prove/support
not pushing horses back into*



**COMMISSION FOR THE
PRESERVATION OF WILD HORSES**

Stewart Facility
Capitol Complex

Carson City, Nevada 89710

(702) 885-5589

September 19, 1989

COMMISSIONERS

Deloyd Satterthwaite, *Chairman*
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Tuscarora, Nevada 89834

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Reno, Nevada 89511

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P.O. Box 5896
Reno, Nevada 89513

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

Dear Mr. Tucker,

Thank you for the opportunity to comment on the Caliente gathering plan EA - document number NV-055.14.

My comments are written to correspond to your pages, headings, subheadings, and numbers. They are as follows:

I. INTRODUCTION/OVERVIEW

A. Purpose and Need

Paragraph 2 - Please provide the monitoring data which demonstrates that horses have definitely established permanent home ranges outside of the existing herd areas. How often were they sighted? Where? By whom? Were colors, markings, and sex noted to be sure that it is the same horses outside of the HMA?

You state that the horses are competing with other ungulates outside of the HMA. What data do you have to show this? Is there no competition inside of the HMA? I understand that you don't have to manage horses outside of HMAs, but I do not appreciate the negativism this statement implies. The claim that horses are competing is unsubstantiated, unwarranted, and adds absolutely nothing. Please delete it.

Paragraph 3 - You state your decision to remove is based on concerns of State Agencies ... What State Agencies? Since the Commission is a State Agency, you are implying that we wish the horses removed. Please name the agencies.

Paragraph 4 - Please explain how you can justify "removal" based on trying to "limit the animals distribution." Removal is not the only option.

II. PROPOSED ACTION AND ALTERNATIVES

You only identify one alternative. Why haven't you looked at pushing or driving the horses back into the HMA's? This would be much more cost effective and less impacting to the horses. Please add this as the preferred alternative.

B. Proposed Action/Mitigation

Please change "remove" to "relocate" within existing HMA's. This is particularly distressing that you have not considered this alternative in light of the fact that you state that: "Subsequent removals of wild horses outside of HMA's will be accomplished to maintain these areas as horse free."

Curtis Tucker
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Page 2

If you have fences that are not being maintained or gates that are being left open, you should enlist the assistance of the permittees in keeping the maintenance done and the gates closed. Do the grazing licenses require fence maintenance by the permittees?

If you choose removals instead of relocating as your policy, you could bleed off an entire herd.

It appears as though you have a fence maintenance problem rather than a horse problem and the horses will be made the scapegoat.

1. Gather Area

All of my maps show the Delamar Herd Area as a herd area. Why are you taking horses from inside a designated herd area? Do you have monitoring data to justify the reduction? Please provide it.

Is there a difference between the Delamar Allotment and the Delamar Herd Area? If so, please provide a detailed map showing the difference.

I would also question why an EA for a "normal" removal plan would be incorporated into an EA for a removal plan for horses outside of a HMA.

Also, please provide the monitoring data which shows that you CANNOT push horses back into adjacent herd areas, if you choose to proceed with the removal. This has occurred several times in the past outside of other HMA's as an alternative to removals.

The Act states that "Nothing in this section shall be construed to authorize the Secretary to relocate horses to areas of the public lands where they do not presently exist." The converse of this section would imply that there is nothing wrong with relocating horses to the areas of public land where they did exist in 1971.

Please also provide the ROD that declared Delamar "horse free." I would also appreciate it if you would not use the term "horse free" in justifying removals from outside HMAs. It tends to have a negative connotation.

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2. Removal Process

This portion should be modified to delete "capture" and change to "relocate" and should provide a method of relocation.

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6. Destruction of Animals

When the BLM's AO is not at the trapsite and therefore appoints a qualified individual, by qualified, do you mean that the substitute has also been trained by a veterinarian for humane euthansia?

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IV. Affected Environment

A. Livestock Grazing

As it is well known and an accepted fact that wild horses do not "hang" in waters the way livestock do, please demonstrate how removing the horses "would realize a beneficial impact (for livestock) as a result of reduced ungulate competition around waters..."

Why will water not be available to livestock during capture operations? Are you water-trapping?

H. Visual Resources

Please add that wild horses will not be available for viewing outside of the HMA's in the proposed actions.

Decision Record/Rational and FONSI

Nothing has been stated anywhere in this document about relocating the wild horses into the adjacent allotments.

I can find no documentation in my records wherein Delamar has been declared horse free.

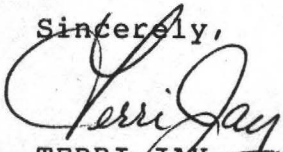
Therefore, I hereby request that horses be relocated into the existing adjacent herd areas unless you have sufficient monitoring data to determine that the herd areas cannot support the additional horses.

Since I have asked for several items of information pertinent to this EA, I hereby request an extension of time to allow for modification of my comments pending receipt of the requested information.

In conclusion, I do not support removal of the horses. I will, however, support a relocation of the horses to adjacent herd areas.

Thank you for your time.

Sincerely,



TERRI JAY
Executive Director