



United States Department of the Interior

BUREAU OF LAND MANAGEMENT
LAS VEGAS DISTRICT OFFICE
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P.O. BOX 26569
LAS VEGAS, NEVADA 89126



IN REPLY REFER TO:

4700
(NV-053)

MAY 17 1990

WFOA
Dawn Y. Lappin
P. O. Box 555
Reno, NV 89504

Dear Ms. Lappin:

Enclosed is a draft copy of the Removal Plan for the Gold Butte Gather and the associated draft Environmental Assessment.

Please review and send any comments or suggestions you may have by June 16, 1990 to:

Mr. Ben Collins
District Manager
Bureau of Land Management
Las Vegas District Office
P.O. Box 26569
Las Vegas, NV 89126

Due to the timeframes for this capture, comments received after June 16, 1990, will not be considered. Your comments should address your area of interest and specific concerns. I would appreciate any additional data or information you may have on the wild burros or habitat within the capture area.

If you have any questions, please direct them to Bob Stager, Las Vegas District Range/Wild Horse and Burro Specialist, at (702) 647-5000. Thank you for your interest in the Las Vegas District wild horse and burro program.

Sincerely,

Ben F. Collins
District Manager

2 Enclosures

1. Draft Removal Plan (15 pgs)
2. Draft Environmental Assessment (25 pgs)

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REMOVAL PLAN FOR
GOLD BUTTE
WILD BURRO GATHER

Prepared by Bob Stager
Wild Horse and Burro Specialist
and
Bruce Sillitoe
Range Conservationist

Bureau of Land Management
Las Vegas District
Stateline Resource Area
Las Vegas, Nevada

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Removal Plan for Gold Butte Wild Burro Gather

Purpose

The proposed action is to restore the range to a thriving natural ecological balance and prevent further deterioration of the range threatened by an overpopulation of wild burros in and around the Gold Butte Herd Management Area (HMA). The proposed action will bring the population of wild burros to a level approaching a balance with available forage within the Gold Butte HMA. The population adjustment is based solely on analysis of monitoring data. Helicopters will be used to capture the wild burros from their primary use area within the HMA (see attached map).

This document outlines the process and the events involved with the wild burro roundup for the Gold Butte Wild Burro Gather. Included are the numbers of burros to be gathered, the time and method of capture, and the handling and disposition of captured burros. Also outlined are the BLM personnel involved with the roundup, the Contracting Officer's Representative (COR) and Project Inspector (PI), the delegation of authority, the briefing of the contractor(s), and the pre-capture evaluation held prior to gathering operations.

Area of Concern

The proposed gather area is located approximately 35 to 50 miles south of Mesquite, Nevada in Eastern Clark County, 150 miles east of Las Vegas, Nevada (driving distance) and includes the Gold Butte Herd Management Area (HMA), in the Bureau of Land Management (BLM) Las Vegas District, Stateline Resource Area. Maps are enclosed to help locate the proposed removal area. The gather area is covered by the Tassi-Gold Butte Herd Management Area Plan (HMAP). The proposed action is consistent with the Stateline Management Framework Plan (MFP) and Record of Decision (ROD). This action is considered a part of long term management.

Number of Burros to be Gathered

The proposed number of burros to be gathered based on analysis of monitoring data and the most recent complete aerial census is shown by area as follows:

Gather Area	Nos. to be Gathered	Nos. to Remain	Census Population(Year)
Gold Butte HMA	250	148	398 (1988)

This capture will leave a minimum of 148 wild burros in the Gold Butte HMA. Any subsequent gather will require additional analysis of monitoring data and a new capture plan and EA. A post gather census will be conducted in the HMA to ensure that the identified population numbers remain after the gather is complete. Burros will be released back into the HMA to maintain these numbers, if necessary.

Time and Method of Capture

The gather is expected to take place through issuance of a removal contract during FY90, and last approximately 4 weeks. The approximate start date for the removal contract is July 12, 1990. Capture activity will be restricted between 5 a.m. and 12 noon to reduce the heat stress on the burros. Based on data collected in the Arizona Tassi part of the herd, foaling occurs year round. As a result, foals are present most of the year. The method of capture to be used will be a helicopter to bring the burros to trap sites and horseback riders at the wings of portable traps. The temporary traps and corrals will be constructed from portable pipe panels. A temporary holding corral will be constructed in the area to hold burros after capture. A loading chute at the holding corral will be equipped with plywood sides or similar material so burros' legs will not get caught in the panels. Trap wings will be constructed of portable panels, jute netting, or other materials not harmful to the burros. Barbed wire or other harmful materials will not be allowed for wing construction. All trap, corral, and wing construction will be approved by the COR.

Other methods of capture will not be considered for various reasons. Water trapping wild burros, though easier on the animal, is not feasible due to the numerous water sources available to burros and the ready access to Lake Mead. Trapping burros by running them on horseback is not feasible because it is too easy to lose the burros after starting them towards the trap; injuries to both people and burros are more likely and the cost factor shown from previous roundups using this method indicates that the costs are prohibitive.

It is estimated that 6 trap locations will be required to accomplish the work. Each site will be selected by the COR after determining the animals habits and the topography of the area. Specific sites may be selected by the contractor with the COR's approval within this general preselected area. Trap sites will be located to cause as little injury to burros and as little damage to the area as possible. Sites will be located on or near existing roads and will receive cultural and threatened/endangered plant and animal clearances prior to construction. Additional trap sites may be required, as determined by the COR, to relieve stress to pregnant jennies, foals, and other burros caused by certain conditions at the time of the gather (i.e., dust, rocky terrain, temperatures, etc.).

Due to many variables such as weather, time of year, location of burros, and suitable trap sites, it is not possible to identify specific locations at this time. They will be determined at the time of the gather. The terrain in the removal area varies from gently sloping alluvial fans to mountainous, and the burros could be located at all elevations during the scheduled gather period. It is expected that they will be located on the alluvial fans due to close proximity to Lake Mead and census data. There are few physical barriers and fences in the area. The contractor will be instructed to avoid them.

Administration of the Contract

BLM will be responsible for capture, care, temporary holding of approximately 250 wild burros, and their transportation to the adoption preparation facility

through the issuance of a removal contract.

Within two weeks prior to the start of the contract, BLM will provide for a pre-capture evaluation of existing conditions. The evaluation will include animal condition, prevailing temperatures, soil conditions, topography, road conditions, locations of fences and other physical barriers, and animal distribution in relation to potential trap locations. The evaluation will also arrive at a conclusion as to whether the level of activity is likely to cause undue stress, and whether such stress would be acceptable to the animals if veterinarian expertise were present, or whether a delay in the capture activity is warranted. If it is determined that the capture requires a veterinarian present, the services of a veterinarian will be obtained before the capture will proceed.

It is recommended that the COR be Bob Stager, Las Vegas District Wild Horse and Burro/Range Specialist. The COR will be directly responsible for conducting the roundup and can appoint other BLM personnel to assist with the roundup as necessary.

Other BLM personnel may be needed to help and include an archaeologist or a district archaeological technician to survey sites for cultural resources, Stateline Resource Area personnel as the need arises, and a BLM law enforcement agent to protect BLM personnel and property from unlawful activities.

The COR is directly responsible for the conduct of the gathering operation and for reporting the roundup proceedings to the Las Vegas District Manager, and the Nevada State Office.

The District Manager is responsible for maintaining and protecting the health and welfare of the wild burros. To ensure the contractor's compliance with the contract stipulations, the COR will be on site during the capture activities. However, the Stateline Resource Area Manager and the Las Vegas District Manager are very involved with guidance and input into this removal plan and with contract monitoring. The health and welfare of the animals is the overriding concern of the District Manager, Area Manager, COR.

The COR will constantly, through observation, evaluate the contractor's ability to perform the required work in accordance with the contract stipulations. Compliance with the contract stipulations will be through issuance of written instructions to the contractor, stop work orders and default procedures should the contractor not perform work according to the stipulations.

To assist the COR in administering the contract, BLM will have a helicopter available at the roundup site. This helicopter will be used with discretion to minimize disturbance of burros that would make gathering more difficult. However, it will be used as needed to assure that the contractor is complying with the specifications of the contract and to ensure the humane capture of animals. If the contractor fails to perform in an appropriate manner at any time, the contract will not be allowed to continue until problems encountered are corrected to the satisfaction of the COR.

All publicity, formal public contact, and inquiries will be handled by the COR through the Stateline Resource Area Manager and the Las Vegas District Manager. The COR will also coordinate the contract with Palomino Valley Corrals, the adoption preparation facility, to assure space is available in the corrals for the captured burros, that they can be handled humanely and efficiently, and that transported animals are arriving in good condition.

Contractor's Briefing

A bidders tour of the area was conducted on January 5, 1990 prior to contract award. The contractor, after award of the contract, will be briefed on his duties and responsibilities before the notice to proceed is issued to him. There will also be an inspection of the contractor's equipment at this time to assure that it meets specifications. Any equipment that does not meet specifications must be replaced within 36 hours. The contractor will also be informed of the terrain involved, the condition of the animals, the condition of the roads, potential trap locations, and the presence of fences and other dangerous barriers.

Branded and Claimed Animals

A notice of intent to impound and a 28-day notice to gather wild burros will be issued concurrently by the BLM prior to any gathering operations in this area.

The Nevada Department of Agriculture and the District Brand Inspector will receive copies of these notices, as well as the Notice of Public Sale if issued. The COR will contact the District Brand Inspector and make arrangements for dates and times when brand inspections will be needed.

When burros are captured, the COR and the District Brand Inspector will jointly inspect all animals at the holding facility in the gathering area. If determined necessary at that time by all parties involved, burros will be sorted into three categories:

- a. Branded animals with offspring, including yearlings.
- b. Unbranded or claimed animals with offspring, including yearlings with obvious evidence of existing or former private ownership (e.g., geldings, bobbed tails, photo documentation, etc.).
- c. Unbranded animals and offspring without obvious evidence of former private ownership.

The COR, after consultation with the District Brand Inspector, will determine if unbranded animals are wild and free-roaming burros. The District Brand Inspector will determine ownership of branded animals and their offspring and, if possible, the ownership of unbranded animals determined not to be wild and free-roaming burros.

Branded burros with offspring and claimed unbranded burros with offspring for which the owners have been identified by the District Brand Inspector will be

retained in the custody of the BLM pending notification of the owner or claimant. A separate holding corral will be set up near the temporary holding corral to house these burros until the owner/claimant or BLM can pick them up. The animals will remain in BLM's custody until settlement in full is made for impoundment and trespass charges, as determined appropriate by the Stateline Area Manager in accordance with 43 CFR Subpart 4710.6 and provisions in 43 CFR Subpart 4150. In the event settlement is not made, the burros will be sold at public auction by the BLM.

Branded burros with offspring whose owners cannot be determined, and unclaimed, unbranded burros with offspring having evidence of existing or former private ownership will be released to the Nevada Department of Agriculture (District Brand Inspector) as estrays.

The District Brand Inspector will provide the COR a brand inspection certificate for the immediate shipment of wild burros to Palomino Valley (Reno), and for the branded or claimed burros where impoundment and trespass charges have not been offered or received, for shipment to public auction or another holding facility.

Destruction of Injured or Sick Animals

Any severely injured or seriously sick animal shall be destroyed in accordance with 43 CFR Subpart 4730.1. Animals shall be destroyed only when a definite act of mercy is needed to alleviate pain and suffering. The COR will have the primary responsibility for determining when an animal will be destroyed and will perform the actual destruction. The contractor will be permitted to destroy an animal only in the event the COR are not at the capture site or holding corrals, and there is an immediate need to alleviate pain and suffering of a severely injured animal. When the COR is unsure as to the severity of an injury or sickness, a veterinarian will be called to make a final determination. Destruction shall be done in the most humane method available as per Washington Office Wild Free-Roaming Horse and Burro Program Guidance dated January 1983. A veterinarian can be called from Las Vegas if necessary to care for any injured burros.

The carcasses of wild burros which die or must be destroyed as a result of any infectious, contagious, or parasitic disease will be disposed of by burial to a depth of at least 3 feet.

The carcasses of wild burros which must be destroyed as a result of age, injury, lameness, or noncontagious disease or illness will be disposed of by removing them from the capture site or holding corral and placing them in an inconspicuous location to minimize the visual impacts. Carcasses will not be placed in drainages regardless of drainage size or downstream destination.

Temporary Holding Facility

The holding facility shall be on public land unless an agreement is made between the contractor and a private landowner for use of private facilities. When private land is used, the contractor must guarantee BLM, and the public, access

to the facilities and accept all liability for use of such facilities.

The contractor shall provide all feed, water, labor, and equipment to care for captured burros at the holding facility. The contractor shall also provide transportation of captured burros from the temporary holding facility to the Nevada Distribution Center, Palomino Valley (Reno), Nevada. BLM will provide transportation of unclaimed and claimed branded burros to an approved facility for release to the claimant or for handling under Nevada State estray laws. All work shall be accomplished in a safe and humane manner and be in accordance with the provisions of 43 CFR Part 4700 and the following specifications, provisions, and attached work location maps. All labor, vehicles, helicopters, traps, troughs, feed, temporary holding facilities, and other supplies and equipment including, but not limited to the aforementioned, shall be furnished by the contractor. BLM will furnish contract supervision.

Stipulations and Specifications

A. Motorized Equipment

1. All motorized equipment employed in transportation of captured animals shall be in compliance with appropriate State and Federal laws and regulations applicable to humane transportation of animals.
2. Vehicles shall be in good repair, of adequate rated capacity, and operated so as to insure that captured animals are transported without undue risk or injury.
3. Only stock trailers shall be allowed for transporting animals from traps to temporary holding facilities. Only Bobtail trucks, stock trailers, or single deck trucks shall be used to haul animals from temporary holding facilities to final destination. Sides or stock racks of transporting vehicles shall be a minimum height of 6 feet 6 inches from vehicle floor. Single deck trucks with trailers 40 feet or longer shall have two partition gates to separate animals. Trailers less than 40 feet shall have at least one partition gate to separate the animals. Each partition shall be a minimum of 6 feet high and shall have a minimum 5 foot wide swinging gate. The use of double deck trailers is unacceptable and shall not be allowed.
4. All vehicles used to transport animals to final destination shall be equipped with at least one door at the rear end of the vehicle which is capable of sliding either horizontally or vertically.
5. Floors of vehicles and the loading chute shall be covered and maintained with a non-skid surface such as sand, mineral soil or wood shavings, to prevent the animals from slipping. This will be confirmed by the COR prior to loading (every load).
6. Animals to be loaded and transported in any vehicle shall be as directed by the COR and may include limitations on numbers according to age, size, sex, temperament, and animal condition. A minimum of 1 linear foot per adult animal and .5 linear foot per foal shall be allowed per standard 8 foot wide stock trailer/truck.

The BLM employee supervising the loading of the wild burros to be transported from the trap to the temporary holding corral will require separation of small foals and/or weak burros from the rest should he/she feel that they may be injured during the trip. He/She will consider the distance and condition of the road and animals in making this determination. Burros shipped from the temporary holding corral to the BLM facility will normally be separated by jacks, jennies and foals (including small yearlings). However, if the numbers of these classes of animals are too few in one compartment and too many in another, animals may be shifted between compartments to properly distribute the animals in the trailer. This may include placing a younger, lighter stud with the jennies or a weak jennies with the foals. Further separation may be required should condition of the animals warrant.

The BLM employee supervising the loading will exercise his/her authority to off-load animals should he/she feel there are too many burros on the trailer/truck.

7. The COR shall consider the condition of the animals, weather conditions, type of vehicles, distance to be transported, or other factors when planning for the movement of captured animals. The COR shall provide for any brand and/or inspection services required for the captured animals.

It is currently planned to ship all burros to the Palomino Valley facility. Communication lines have been established with the Palomino Valley personnel involved in off-loading the burros, to receive feedback on the condition of shipped burros. Should problems arise, shipping methods and/or separation of the burros will be changed in an attempt to alleviate the problems.

8. If the COR determines that dust conditions are such that the animals could be endangered during transportation, the contractor will be instructed to adjust speed. The maximum distance over which animals may have to be transported on dirt roads is approximately 30 miles per load.

Periodic checks by BLM employees will be made as the burros are transported along dirt roads. If speed restrictions are placed in effect, then BLM employees will, at times, follow and/or time trips to ensure compliance.

B. Trapping and Care

1. All capture attempts shall be accomplished by the utilization of a helicopter. A minimum of one saddle horse shall be immediately available at the trap site to accomplish roping if necessary. Roping shall be done as determined by the COR. Under no circumstances shall animals be tied down for more than 1 hour.

Roping will be allowed to capture an orphaned foal or a suspected wet jenny.

2. The helicopter shall be used in such a manner that bands or herds will

remain together. Foals shall not be left behind.

The Las Vegas District will use an observation helicopter as the primary means in which to supervise the use of the project helicopter. In the absence of an observation helicopter, the project helicopter or saddle horses may be used to place a BLM observer on a point overlooking the area of the helicopter herding operations.

3. The rate of movement and distance the animals travel shall not exceed limitations set by the COR who will consider terrain, physical barriers, weather, condition of the animals, and other factors.

BLM will not allow burros to be herded more than 4 miles nor faster than 10 miles per hour. The COR may decrease the rate of travel or distance moved should the route to the trap site pose a danger or cause avoidable stress (steep and/or rocky). Animal condition will also be considered in making distance and speed restrictions.

Special attention will be made to avoid physical hazards such as fences.

4. It is estimated that 6 trap locations will be required to accomplish the work. All trap locations and holding facilities must be approved by the COR prior to construction. The contractor may also be required to change or move trap locations as determined by the COR. All traps and holding facilities not located on public land must have prior written approval of the landowner.

If tentative trap sites are not located near enough to the concentrations of burros, then the trap site will not be approved. The COR will move the general location of the trap closer to the burros. Trap sites will not be approved where barbed-wire fences are used as wings, wing extensions, or to turn the burros, during herding, toward the trap.

5. All traps, wings, and holding facilities shall be constructed, maintained and operated to handle the animals in a safe and humane manner and be in accordance with the following:

a. Traps and holding facilities shall be constructed of portable panels, the top of which shall not be less than 60 inches high, and the bottom rail of which shall not be more than 12 inches from ground level. All traps and holding facilities shall be oval or round in design.

b. All loading chute sides shall be fully covered with plywood or like material. The loading chute shall also be a minimum of 5 feet high.

c. All runways shall be a minimum of 20 feet long and a minimum of 5 feet high and shall be covered with plywood or like material a minimum of 1 foot to 5 feet above ground level.

d. Wings shall not be constructed out of barbed wire or other

materials injurious to animals and must be approved by the COR.

The Le. ~~Y~~All crowding pens including the gates leading to the runways shall be covered with a material which prevents the animals from seeing out (plywood, burlap, etc.) and shall be covered a minimum of 1 foot to 5 feet above ground level. Eight linear feet of this material shall be capable of being removed or let down to provide a viewing window.

matef. All pens and runways used for the movement and handling of animals shall be connected with hinged self-locking gates.

6. No fence modification will be made without authorization from the COR. The contractor shall be responsible for restoration of any fence modification which he has made.

If the route the contractor wishes to herd burros passes through a fence, the contractor will be required to roll up the fencing material and pull up the posts to provide at least one-eighth mile of gap. The standing fence on each side of the gap will be well-flagged for a distance of 300 yards from the gap on each side.

7. When dust conditions occur within or adjacent to the trap or holding facility, the contractor shall be required to wet down the ground with water.

8. Alternate pens, within the holding facility shall be furnished by the contractor to separate jennies with small foals, sick and injured animals, and estray animals from the other burros. Animals shall be sorted as to age, number, size, temperament, sex, and condition when in the holding facility so as to minimize, to the extent possible, injury due to fighting and trampling.

As a minimum, jacks will be separated from the jennies and foals when the animals are held overnight.

9. Animals shall be transported to final destination from temporary holding facilities within 24 hours after capture unless prior approval is granted by the COR for unusual circumstances. Animals shall not be held in traps and/or temporary holding facilities on days when there is no work being conducted except as specified by the COR. The Contractor shall schedule shipments of animals to arrive at final destination between 6:00 a.m. and 4:00 p.m. Every effort will be made to ensure that the time burros are standing on the trucks prior to off loading is minimized. No shipments shall be scheduled to arrive at final destination on Sunday.

10. The Contractor shall provide animals held in the traps and/or holding facilities with a continuous supply of fresh clean water at a minimum rate of 10 gallons per animal per day. Animals held for 10 hours or more in the traps or holding facilities shall be provided good quality hay at the rate of not less than 2 pounds of hay per 100 pounds of estimated body weight per day.

11. It is the responsibility of the contractor to provide security to prevent loss, injury or death of captured animals until delivery to final destination.

12. The contractor shall restrain sick or injured animals if treatment by the Government is necessary. The COR will determine if injured animals must be destroyed and provide for destruction of such animals. The contractor may be required to dispose of the carcasses as directed by the COR.

C. Helicopter, Pilot, and Communications

1. The contractor must operate in compliance with Federal Aviation Regulations, Part 91. Pilots provided by the contractor shall comply with the Contractors Federal Aviation Certificates, applicable regulations of the State of Nevada and shall follow what are recognized as safe flying practices.

2. When refueling, the helicopter shall remain a distance of at least a 1,000 feet or more from animals, vehicles (other than fuel truck), and personnel not involved in refueling.

3. The COR shall have the means to communicate with the Contractor's pilot and be able to direct the use of the gather helicopter at all times. If communications cannot be established, the Government will take steps as necessary to protect the welfare of the animals. The frequency(s) used for this contract will be assigned by the COR when the government furnished "slip-in" VHF/FM portable radio is used. When a VHF/AM radio is used, the frequency will be 122.925 MHz.

4. The contractor shall obtain the necessary FCC licenses for the radio system.

5. The proper operation, service and maintenance of all contractor furnished helicopters is the responsibility of the contractor. The BLM reserves the right to remove from service pilots and helicopters which, in the opinion of the contracting officer or COR violate contract rules, are unsafe or otherwise unsatisfactory. In this event, the contractor will be notified in writing to furnish replacement pilots or helicopters within 48 hours of notification. All such replacements must be approved in advance of operation by the contracting officer or his/her representatives.

D. Contractor-Furnished Property

1. All hay, water, vehicles, saddle horses, helicopters and other equipment shall be provided by the contractor. Other equipment includes, but is not limited to, a minimum of 1,500 linear feet of 60-inch high (minimum height) panels for traps and holding facilities. Separate water troughs shall be provided at each pen where animals are being held.

2. The contractor shall furnish an avionics system that will allow

communications between the contractor's helicopter and his fuel truck.

3. The contractor shall furnish a VHF/AM radio transceiver in the contractor's helicopter which has the capability to operate on a frequency of 122.925 MHz.

4. The contractor shall provide a programmable VHF/FM radio transceiver in the contractor's helicopter to accommodate the COR in monitoring the gather operation.

THE CONTRACTOR'S WORK IS SUBJECT TO THE TERMS AND CONDITIONS OF THE CONTRACT AND SPECIFICATIONS.

system.

are unsafe or otherwise unsatisfactory. Any deficiencies will be notified in writing to the contractor.

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Prepared by:

Bob Stager
Wild Horse and Burro Specialist
Las Vegas District

Date

Bruce Sillitoe
Range Conservationist
Stateline Resource Area

Date

Reviewed by:

Runore Wycoff
Stateline Area Manager
Las Vegas District Office

Date

Colin P. Christensen
Assistant District Manager, Resources
Las Vegas District Office

Date

Concurred by:

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Ben F. Collins
District Manager
Las Vegas District Office

Date

Approved by:

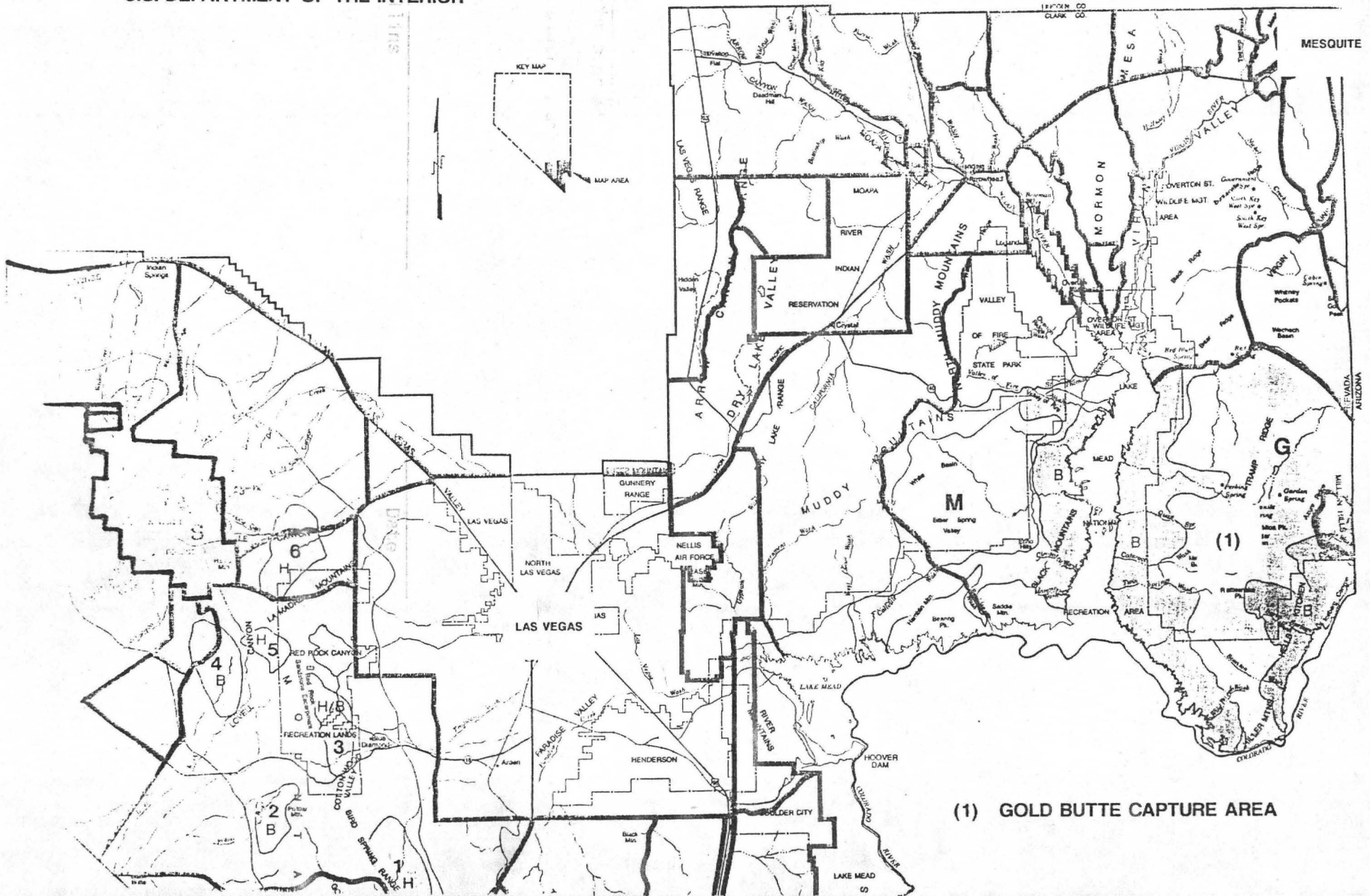
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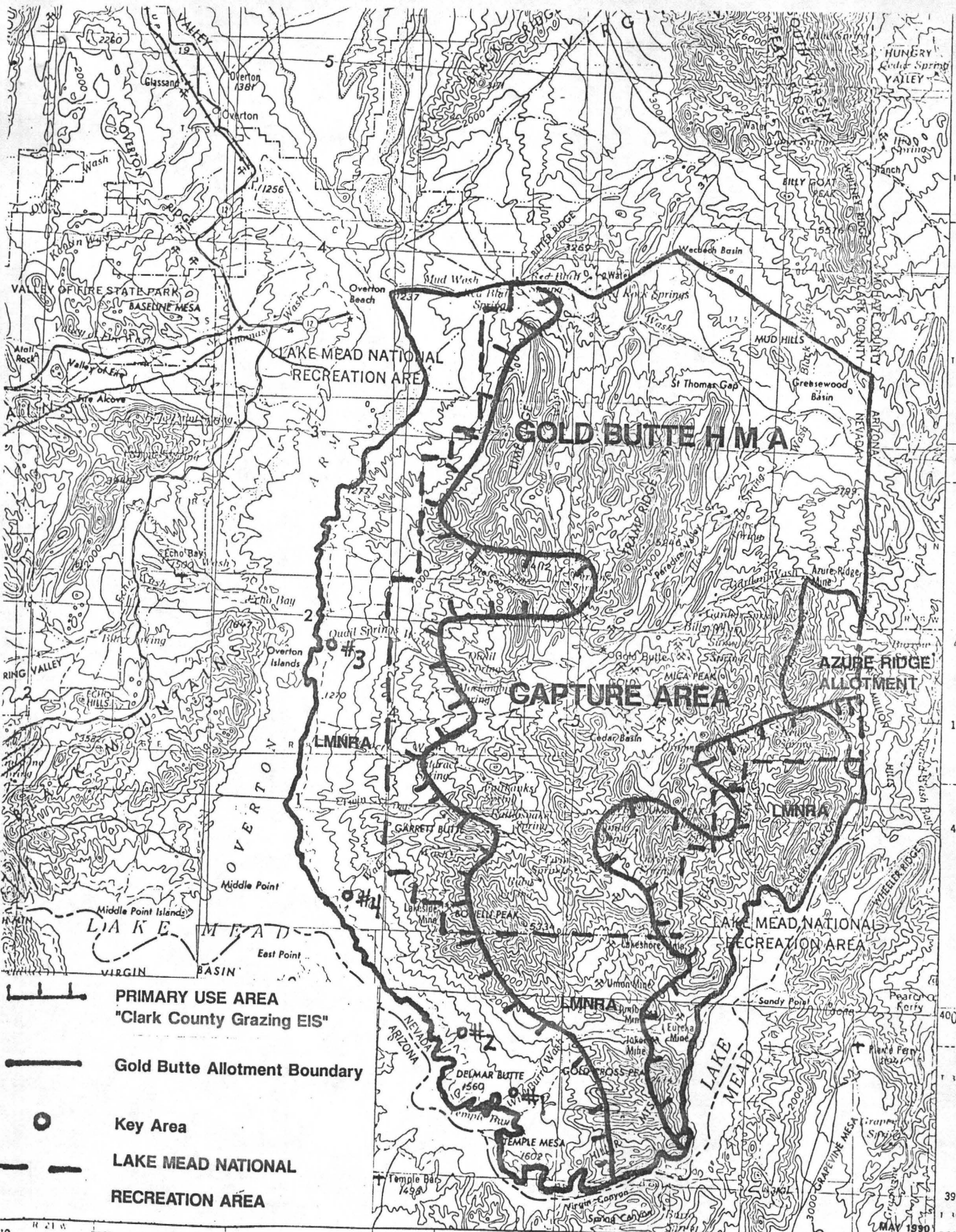
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LAS VEGAS DISTRICT

BUREAU OF LAND MANAGEMENT

U.S. DEPARTMENT OF THE INTERIOR





-  PRIMARY USE AREA
"Clark County Grazing EIS"
-  Gold Butte Allotment Boundary
-  Key Area
-  LAKE MEAD NATIONAL RECREATION AREA

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ENVIRONMENTAL ASSESSMENT
for the
GOLD BUTTE WILD
BURRO GATHER

EA No. NV-054-90-30

Prepared by Bob Stager
Wild Horse and Burro Specialist

Bureau of Land Management
Las Vegas District
Stateline Resource Area
Las Vegas, Nevada

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BACKGROUND INFORMATION

Introduction

The Bureau of Land Management (BLM) Las Vegas District, Stateline Resource Area, is proposing to remove excess wild burros from the Gold Butte Herd Management Area (HMA). The HMA encompasses approximately 65 percent Public Lands and 35 percent Lake Mead National Recreation Lands (LMNRA) administered by the National Park Service (NPS).

The proposed gather area is located approximately 35 to 50 miles south of Mesquite, Nevada in Eastern Clark County, 150 miles east of Las Vegas (driving distance), Nevada and includes the Gold Butte Herd Management Area (HMA), in the Bureau of Land Management (BLM) Las Vegas District, Stateline Resource Area. The gather area is covered by the Tassi-Gold Butte Herd Management Area Plan (HMAP). The proposed action is consistent with the Stateline Management Framework Plan (MFP) and Record of Decision (ROD). It is also consistent with the management goals of the NPS in the LMNRA. This action is considered a part of long term management. (see Appendix I - Location Maps).

Purpose and Need

The purpose of the proposed action is to remove excess wild burros from the Gold Butte HMA.

The removal of wild burros is necessary to restore the range to a thriving natural ecological balance and multiple use relationship and prevent further deterioration of the vegetative community threatened by an overpopulation of wild burros within the Gold Butte HMA. The proposed action involves burro removals in order to correct resource degradation identified from analysis of rangeland monitoring data from the Gold Butte Allotment Evaluation. The HMA includes approximately 96,890 acres of land administered by the National Park Service in the Lake Mead National Recreation Area and 176,878 acres of Public Lands administered by the Bureau of Land Management for a total of 273,768 acres. No removals have occurred in the past for the HMA and population numbers have grown unchecked. Refer to Appendix II for allotment evaluation summaries.

Relationship to Planning

This EA is tiered to the Stateline Grazing Environmental Impact Statement (EIS) which analyzed the general ecological impacts of managing rangelands in the Stateline Resource Area under a program of habitat monitoring and adjustment of wild burros and livestock. This EA is a project specific refinement of the EIS focused on the removal of excess wild burros in the Gold Butte HMA. The decisions regarding overall rangeland management analyzed in the Stateline EIS will not be changed by the Gold Butte Removal Plan. Both documents are available for public review at the Las Vegas District Office. The gather area is covered by the Tassi-Gold Butte Herd Management Area Plan (HMAP) dated May 28, 1982 written jointly with the Arizona BLM. The proposal is in conformance with the Stateline MFP (1983) and ROD (1984), as well as the 1971 Wild Horse and Burro Act (Public Law 92-195), as amended.

Major Issues

This proposal is concerned with two major issues. The first issue is to maintain an ecological balance and multiple use relationship of the area by managing wild burros within HMA boundaries at a level established through the analysis of monitoring data. The second issue is the humane treatment and safe handling of the wild burros during capture, care, temporary holding, and transportation to the BLM adoption preparation facility.

DESCRIPTION OF PROPOSED ACTION AND ALTERNATIVES

Proposed Action

The proposed action consists of using a helicopter to gather approximately 250 excess wild burros as follows:

Gather Area	Nos. to be Gathered	Nos. to Remain	Censused Population(Year)
Gold Butte HMA	250	148	398 (1988)

This capture will leave a minimum of 148 wild burros in the Gold Butte HMA. Any subsequent gather will require additional analysis of monitoring data and a new capture plan and EA. A post gather census will be conducted in the HMA to ensure that the identified population numbers still remain after the gather is complete. Burros will be released back into the HMA to maintain these numbers, if necessary.

The burros will be gathered using a helicopter and portable wing traps. The gather is expected to take place through issuance of a removal contract during FY90, and last approximately 4 weeks. The approximate start date for the removal contract is July 12, 1990.

It is estimated that 6 temporary traps with deflector wings encompassing approximately 1 acre each would be constructed on public lands and LMNRA lands in the primary use and critical habitat of the herd area. Temporary trap and corral sites would be selected by the contractor and approved by BLM. Each facility would be constructed from portable pipe panels. These traps would be moved as needed during the gathering operation and completely removed from the area after the contract is completed. A contracted helicopter and experienced wranglers would be used to drive and direct burros to each trap site in an efficient and careful manner. Hazards such as cliffs, fences, and old mine shafts would be scouted in advance and avoided. Existing roads and trails would be used whenever possible. Burros would be hauled by truck to temporary holding facilities in Palomino Valley, Nevada, for processing, then shipped to distribution centers for adoption. Burros that might be held at the trap site in excess of 10 hours would have food and water provided.

Written jointly with the Arizona BLM. The proposal is in conformance with the Branded trespass burros or other claimed burros and their current year's foals would be impounded and held until trespass fees, gathering fees, and other associated costs as determined by the Stateline Area Manager are paid to the

Bureau, and then these animals would be turned over to the owner. Branded burros not claimed would be treated under the Nevada State estray laws.

Applicable Standard Operating Procedures

These standard operating procedures (SOP's) are also part of the proposed action:

- (1) Burro handling will be kept to a minimum. Capture and transporting operations can be traumatic to the animals. Minimizing the handling would increase the safety of the animals, as well as the handlers.
- (2) The foaling season occurs year around in the wild burro herd along Lake Mead based on monitoring and capture data collected by the BLM. No time of year for capture activities is indicated by the best available information to be better than another to avoid foaling.
- (3) Burros will not be run more than 4 miles nor faster than 10 miles per hour during gathering operations and gathering will be done in the early morning starting at 5 a.m. and ending no later than 12 noon to avoid overheating burros during hot weather.
- (4) A veterinarian will be on call during gathering operations.
- (5) Trap sites or holding corrals will not be placed in areas of any known listed or proposed threatened or endangered plant or animal species. A no affect determination has been made for trap or holding corral locations in relation to the Desert Tortoise. The capture area is a low density tortoise area. Eighty-five percent of the HMA and all of the burro primary use area is located in uncategorized desert tortoise habitat. Specific trap site inspections will be made by the COR to place the trap in an area with no desert tortoise.
- (6) A cultural resources investigation by an archaeologist or a district archaeological technician will be conducted prior to any trap or holding corral construction. If cultural values are discovered, an alternate site will be selected.
- (7) Helicopters will be used with caution. A qualified district BLM representative (COR) will be present during gathering attempts to ensure strict compliance with the above mileage limitations and 43 CFR Part 4700 regulations. He will make a careful determination of a boundary line to serve as an outer limit within which attempts will be made to herd burros to a given trap. Topography, distance, weather, and current conditions of the burros will be considered in setting the mileage limits so as to avoid undue stress on the burros while they are being herded. The COR will be present at the gathering site to ensure minimum injury or other traumatic effects to the burros and that contract stipulations are adhered to. The Authorized Officer will also have a helicopter on site to use in monitoring and supervising the contract. This helicopter will be used with discretion to minimize disturbance of burros which could make gathering more difficult. However, it will be used as needed to assure

that the contractor is complying with the contract specifications.

(8) Captured burros that are obviously lame, deformed, or sick will be humanely disposed of at the trap site.

(9) Every effort will be made to keep jennies and their young foals together.

(10) A BLM law enforcement agent will be present, if needed, during the gathering operation to provide protection for personnel working on the roundup, as well as the gathered burros.

(11) Temporary traps and corrals will be removed and sites will be left clean of all debris within 30 days following the gathering operation.

(12) Traps may be established within the Lime Canyon and/or Garrett Butte WSA's. They will be temporary structures approximately one acre in size with minimum site disturbance. No holding corrals will be established within WSA's. Motorized vehicles will be confined to existing roads and ways.

In addition to the standard operating procedures, the stipulations and specifications as listed in the Removal Plan for the Gold Butte Gather will also be considered as part of the proposed action.

Alternatives

Different methods of capturing wild burros are discussed in the removal plan and will be briefly discussed in the alternative section of this environmental assessment. Current economic and political constraints limit "technically feasible and reasonably available" alternatives which could be expected to attain the objectives of the proposed action.

Alternative I - Water Trapping Wild Burros

Water trapping wild burros, though easier on the animal, is not feasible due to the numerous water sources available to burros and the ready access to Lake Mead in the proposed gathering area. Water traps take time to construct and require time for burros to accept as part of their environment; the time allotted to this roundup is limited; therefore, this alternative will not be considered further.

Alternative II - Trapping Wild Burros by Running Them on Horseback

Trapping burros by running them on horseback is not feasible because it is too easy to lose the burros after starting them towards the trap. Injuries to both people and burros are more likely. The cost factor shown from previous roundups using this method indicates that the costs are prohibitive. This alternative will, therefore, not be considered further.

Alternative III - No Action

Under the No Action alternative no gathering operations would be conducted; no wild burros would be gathered. Herd numbers would not be held at the levels established through analysis of monitoring studies. Environmental degradation would continue and expand beyond the approximately 53,665 acres experiencing heavy to severe use levels and downward observed apparent trend and wild burros would eventually be established outside of HMA boundaries. Since this would be out of conformance with the land use plan, this alternative will not be considered further.

DESCRIPTION OF THE AFFECTED ENVIRONMENT

A complete description of the affected environment can be found in the Draft Clark Grazing EIS (1982). This document is on file at the BLM Las Vegas District Office. Certain elements of the affected environment, which are necessary for the understanding of the anticipated impacts, will be described in the environmental consequences section for the proposed action.

The distribution and densities of the wild burros within the critical and/or primary use area is dependent upon the following factors in order of priority during the hot summer and fall months:

1. Shade
2. Water
3. Forage

The historic principal water source is Lake Mead and was the Colorado River channel prior to the construction of the Hoover Dam within the primary use area. The primary burro use area is within 2 1/2 to 9 aerial miles from the approximately 55 miles of Lake Mead waterfront available to the Gold Butte wild burro herd. Both BLM and LMNRA administered lands are utilized by the burros in this area with trailing between the two lands documented with monitoring data.

With water readily available and not limiting, shade plays the most important role during the hot months in determining the distribution and densities of wild burros in the critical and/or primary use area. Census data indicates that most of the burro activity is located in the deeply dissected alluvial fans where shade is provided by the steep slopes of the drainages. The temperature in the shade cast by a canyon wall can be as much as 20 degrees cooler than in the direct sun. Shade in the Mojave Desert Vegetative Community is essential for the wild burros to adequately regulate their body temperatures during summer temperatures of 100+ degrees.

Monitoring data analyzed in the Gold Butte Allotment Evaluation in 1988 and finalized in 1989 supplemented with additional data collected in 1990, show that the areas within the Gold Butte Herd Management Area with heavy to severe use levels are localized within the southern, western, and southeastern parts of the HMA. This is within the primary use area identified within the Draft Clark EIS. For this reason, all animals removed will only be from the primary use area.

Field inspections show that the southern most part of the primary use area is only accessible by boat or barge. Any future capture activities must be completed using a barge in these areas.

Field inspections and monitoring data indicates that overlap in use between livestock and wild burros is very low within most of the critical and/or primary use area. There is little to no cattle sign and the livestock operator avoids using the area due to the lack of forage.

ENVIRONMENTAL CONSEQUENCES

Proposed Action

There would be no adverse impacts from the proposed action to threatened or endangered species (plants or animals); floodplains; wetlands; areas of critical environmental concern; wild and scenic rivers; visual resource management; prime or unique farmlands; or cultural, paleontological, and historical resource values.

Threatened and Endangered Plants:

The species Ferocactus acanthodes var. lecontei is listed on the state of Nevada's Watch Species List. It is located in the Devils Cove area within the burro critical and/or primary use area. The COR will inspect each trap site within Devils Cove and insure that traps and holding corrals avoid this plant species.

Threatened and Endangered Animals:

Much of the primary wild burro use area has a low density population of the federally listed threatened desert tortoise (Gopherus agassizii). The approximately one acre temporary corrals will be inspected by the COR and located in areas without desert tortoise.

There are approximately 53,665 acres within the primary use area experiencing heavy to severe wild burro utilization levels with existing herd numbers. The removal of 250 burros would reduce disturbance to the desert tortoise and its' habitat. Management of the wild burro population in a thriving ecological balance would have beneficial impacts on the desert tortoise by reducing utilization levels.

Water and Riparian:

Most of the shore and adjacent washes to Lake Mead within the Gold Butte HMA show heavy to severe use by wild burros. The Gold Butte Allotment Evaluation documents damage attributable to wild burros along the lakes border. Heavy trailing due to overpopulation has resulted in large numbers of frequently used dusting areas near and trampling along the lake within the primary burro use area.

Reduced wild burro numbers would lessen grazing and trampling on the lake shore and washes contributing to a more favorable riparian habitat.

Wilderness Values

The Lime Canyon and Garrett Butte WSA's occur in the gather area. The use of aircraft for removing wild burros from within WSA's is consistent with the Interim Management Policy and Guidelines for Lands Under Wilderness Review (11/10/87), since it is considered as a non-impairing activity. The traps will be temporary structures approximately one acre in size with minimum site disturbance, no holding corrals will be established within the WSA's and motorized vehicles will be confined to existing roads and ways.

Social and Economic Values:

Positive management and maintenance of wild burro numbers at a viable herd level could meet the objectives of wild burro advocates. The removal of excess wild burros from the gather area would please Lake Mead recreational users. Proceeding with the gather would help public relations for the Las Vegas BLM District. There would be an economic benefit to the private contractor who is hired to remove the excess wild burros.

Air Quality:

Short-term increases in transient dust levels caused by operation of ground vehicles and running burros would occur. Short-term impacts to air quality would also occur during gathering operations and handling of burros, resulting from helicopter and vehicle exhaust emissions.

Wild Burros:

The proposed gather area is located approximately 35 to 50 miles south of Mesquite, Nevada in Eastern Clark County, 150 miles east of Las Vegas (driving distance), Nevada and includes the Gold Butte Herd Management Area (HMA), in the Bureau of Land Management (BLM) Las Vegas District, Stateline Resource Area. The most recent complete aerial census conducted in the Gold Butte HMA was in February/March 1988 and resulted in an actual count of 331 adult and 67 young or 398 wild burros in the HMA. The young to adult ratio in 1988 was 20 percent with 17 percent of the herd being young wild burros. Of the 398 burros counted in the HMA, all were located in the critical and/or primary use area. Refer to the HMA maps in appendix I.

Use pattern and burro movement data collected in March 1990 shows approximately 53,665 acres of the 120,495 acres of the critical and/or primary use area having heavy to severe utilization levels for the 1989 growing season. This equates to 46 percent of the area. The burro trails and dusting areas showed clear trailing back and forth between the BLM and LMNRA administered lands. The close proximity and ready access to drinking water from Lake Mead is the reason for the size and shape of the critical and/or primary use area. All burros removed will be from trap sites located within the critical and/or primary use area. No burros will be removed outside this area within the HMA.

From analysis of data collected from key areas and use pattern mapping from 1981 to 1989 it was determined that a range of 22 to 98 wild burros are the estimated numbers that the Gold Butte HMA can support while maintaining an ecological balance among vegetation, wild burros, and wildlife. (see Appendix II).

A negative impact on wild burros would be expected during gathering and handling. This would result from traumatic effects of capturing, trapping, loading, and hauling the animals. The use of helicopters to capture excess wild burros may result in leppy foals and split bands, as well as injured burros. Incidents like these tend to be increased if the animals are pushed too hard. Death loss is not expected to exceed 2% of the burros captured at the trap site. The standard operating procedures and contract specifications will minimize the negative impacts from gathering, and help ensure humane treatment and safe handling of the wild burros during capture, care, temporary holding, and transportation to the BLM adoption preparation facility.

Removal operations may disrupt band structure either temporarily or permanently and cause some stress to individuals. A certain degree of heterozygosity will be lost from a small population as a result of removals. However, removals may disrupt the band structure of remaining wild burros which would facilitate recombination of adult burros which may lead to an increase in average heterozygosity. If removals are selective in any way, this loss of heterozygosity will be greatly increased.

Enough burros would remain to maintain viable herds and provide for interaction between bands. Reduced competition among wildlife and burros for forage, water, cover, and living space would result in better condition animals, as well as higher survival and reproduction rates in each. Managing the wild burros within HMA boundaries at the established initial management levels based on an analysis of monitoring studies will help maintain the ecological balance and multiple use relationship of the area also.

Much biological information can be obtained from the gathered animals (sex and age ratios, parasites, diseases, etc.). By conducting the capture, completing a post capture census, and collecting annual utilization/use pattern mapping data, it will help in establishing a herd population number that is in balance with the ecosystem. All of this information would be useful in future wild burro management.

Soils:

Areas which presently exhibit soil erosion and compaction would be positively impacted because of the reduction of animals and decreased trampling effects. New trampling areas and resultant soil compaction would be created at the trap and holding corral sites by the large number of burros concentrated there. Since the impacted area would be small in relation to the gather area, and the time for gathering is short lived, the impact would be minor

Vegetative cover has a direct influence on the erosion potential of soils. The reduction in burro numbers and the resultant reduction in vegetative utilization (especially in heavy and severe use areas) would have both short and long-term beneficial impacts to the soils resource. These beneficial responses - less soil compaction and improved soil production potential- would be most important in heavy burro use areas.

Vegetation:

Utilization studies and use pattern mapping of the vegetation completed since 1981 show that extensive areas within the HMA are currently receiving heavy and severe use. Based on monitoring data and field inspections since 1981, this use can be attributed to wild burros. Burro use in the primary use area is yearlong. The same monitoring data and field inspections since 1981, indicate that cattle use in the primary use area is very limited with no use over most of the area. This area is shown in Appendix I Maps of the Gold Butte Gather Area.

Wild burro use is based on actual use data, aerial census data, field observations, and analysis of where the grazing use occurred. The observed apparent trend of the area is downward with most the primary use area with ecological status at mid seral (fair condition) based on professional judgement. The vegetative communities in the primary use area are shrub dominant and have limited potential for improvement when degraded. At current population levels, the ecological status of the HMA within the critical and/or primary use area will continue to deteriorate.

Wild burro key area photo trend are established in the HMA and were read in 1981 and 1989 for 1981 and 1988 use levels. Determination of key areas and establishment of trend and utilization studies will continue, following established procedures in the Nevada Range Monitoring Procedures and BLM Handbook TR 4400-4. All utilization studies were conducted using the key forage plant method as recommended in the Nevada Rangeland Monitoring Handbook. Refer to the Gold Butte Allotment Evaluation and Gold Butte HMAP for allowable use levels established for key management species. Utilization levels increased from 1981 to 1989. Use levels in 1981 for burro key areas 1, 2, and 4 averaged 70 percent. In 1989, use was severe at 90+ percent use on white bursage a key species. Use on white bursage was so severe that large stems were eaten and catclaw had branches removed and bark stripped. Cactus were noted dug up with the roots being eaten by hungry wild burros. The absence of palatable grass species accounted for the heavy to severe use on the selected key species.

Use pattern maps were completed for the HMA for the 1986, 1988, and 1989 growing seasons. These showed large areas with heavy and severe utilization levels in the wild burro critical and/or primary use area. Refer to appendix I for results.

Vegetative exclosures two acres in size with long term trend studies were established in May 1990 to help monitor use and trends on the LMNRA part of the HMA.

Based on an analysis of the monitoring data within the Gold Butte Allotment evaluation, 250 or more excess wild burros need to be removed to help maintain an ecological balance in the area. The removal is proposed as follows (see Appendix II):

In the Gold Butte HMA critical and/or primary use area 250 wild burros will be removed, leaving 148 burros upon completion of the removal, based on an analysis of monitoring data. More than 250 should be removed based on the data, however, only 250 will be removed and subsequent utilization data collection will be evaluated with post capture census results to determine future management actions.

Studies data, as well as the allotment evaluation summaries for the Gold Butte Allotment, provide a detailed analysis on which this removal proposal is based. These documents are on file at the BLM Las Vegas District Office. (Studies files - 4400.2; evaluation files - 4400.3).

Removal of wild burros will help prevent further deterioration of the range due to the wild burro overpopulation. By removing the excess wild burros, the remaining population will facilitate achieving a thriving ecological balance among wild burros, wildlife, livestock and vegetation. The allotment specific objectives for vegetation, as stated in the Gold Butte Allotment Evaluation, will be closer to attainment through this removal of 250 excess wild burros.

There may be a short-term negative impact to the vegetation at the trap sites and holding corrals, which would be approximately 1 acre each. The vegetation would be severely trampled by all the burros that would be concentrated at those locations. This would be a minor impact, though, because the impacted areas would be small in relation to the gather area and would usually be located in active washes. Vegetative regeneration would be expected within 2 to 3 years depending on climatic conditions.

The reduction in wild burros would have a positive long-term impact on the vegetative community of the area. The ecological condition of the different plant communities would begin to improve after the gather. The shrub population would not be utilized in excess of 100 percent as is currently the case. The bark stripping on cat claw and the roots of cactus would be less likely targets for hungry wild burros. Production of these species would increase and more desirable herbaceous species could increase their percentage of composition within the community.

Decreased grazing pressure would slow downward trends in overall range condition and would improve the ecological balance and multiple use relationship of the area.

Wildlife:

A minor impact to wildlife is expected during the gather. Some animals could be temporarily frightened or displaced by the increased activity during the removal operation. The mule deer herd in the Gold Butte area is very small and is not likely to be affected. Helicopters have been

observed to produce negative impacts on wildlife species - running and panic behavior in big game species, flight response in waterfowl, and frantic escape behavior in eagles and other raptors. Although the precise overall impacts of low-flying aircraft on wildlife are not known at the present time caution will be exercised in using helicopters in wildlife concentration areas to minimize the impacts to bighorn sheep and other species.

Any reduction in wild burro numbers should reduce competition for forage and result in a beneficial impact to the mule deer and big horn sheep populations.

Reduced use and trampling on the shores of Lake Mead should benefit a large number of wildlife species.

Livestock Grazing:

The Gold Butte HMA lies within the Gold Butte and Azure Ridge Allotments. This removal will have no impact on the Azure Ridge Allotment, as the actual capture sites will not be in this allotment based on pre-capture site identification by the COR in March 1990.

Both allotments are classified as ephemeral allotments. Grazing preference for ephemeral forage is expressed in terms of the allotment or area used and not in terms of AUM's (BLM Manual 4110-1.22). Under the ephemeral range rule, livestock use is adjusted to the annual capacity available from year to year. The ten year permits only specify the area of use since grazing use is authorized only upon the periodic availability of forage. There are no AUM's grazing preference for the Gold Butte or Azure Ridge Allotments. Over 90 percent of the HMA is within the Gold Butte allotment.

Grazing on the LMNRA is permitted as per Interagency Agreement (CA-8360-72-01) grazing agreement.

The Gold Butte allotment has been grazed at a range of 2562 AUMs to 3915 AUMs between 1980 and 1986.

The LMNRA has most of the heavy to severe use levels due to excess wild burro use within the critical and/or primary use area.

Livestock should not be disturbed by the activities associated with the gather due to the lack of measurable overlap within the burro's critical and/or primary use area. Any affect would be a short-term impact and only at the time of the removal. There would be no impact to the Azure Ridge allotment.

PROPOSED MITIGATING MEASURES

1. Wherever possible, gathering will avoid areas of high concentrations of mule deer and big horn sheep to avoid stressing these animals.

2. Any livestock concentrations will be avoided whenever possible to reduce the disturbance to them during the gather.
3. Burros will normally not be kept within the traps or corrals for more than 1 day to minimize stress to the animals and trampling effects and soil compaction, unless approved by the COR. Number of burros to be held may vary depending on how many are caught in any one area. Burros may be held longer than 1 day, dependent upon shipping schedules, number of burros captured, or other unforeseen circumstances.
4. Capture sites will be located on or near existing roads and will receive threatened/endangered plant and animal clearances by the BLM prior to construction. All travel will be restricted to existing roads to adequately manage vehicle travel through tortoise habitat. All parking and staging areas will be clearly identified and discussed with the capture crew prior to allowing the capture to begin. BLM personnel will be on site during the capture to ensure compliance with contract stipulations and eliminate potential conflict with desert tortoise and their habitat.

SUGGESTED MONITORING

The COR will continuously monitor the gather operation to ensure that all conditions and stipulations in this EA are complied with. The project area will be cleaned up (trash and debris) prior to release of the Contractor. All the temporary traps and holding corrals will be removed by the Contractor within 30 days following contract completion.

The COR will conduct an aerial census, by helicopter, of the HMA immediately following the gather to determine whether the proper number of burros remains. Additional aerial census will be conducted every year thereafter (funding permitting) to monitor the growth of the herds. When census numbers exceed the proper number for management based on analysis of monitoring studies, a follow-up gather will be proposed to again reduce the herd to its proper management level.

Key area utilization and use pattern maps will be completed every year until the herd is determined to be in ecological balance with its habitat.

CONSULTATION AND COORDINATION

Intensity of Public Interest

Nationally, the issue of wild burros on western public rangelands has been an intense controversy spanning many years and beginning prior to the passage of the Wild Horse and Burro Act in 1971. Wild burro preservationists are generally concerned with maintaining adequate habitat on public lands for optimum population levels of wild burros and viable herds.

Some ranchers who graze livestock on public lands view excess wild burros as

competitive with livestock for forage and water. However, most ranchers and others support a maintenance of viable herd numbers of wild burros.

Sportsmen and other wildlife interests also see excess burros as a competitive threat to wildlife populations and site competition for food, water, cover, and space as being detrimental.

Nevada is the home state of the wild horse protection movement fostered by the late Velma Johnston ("Wild Horse Annie"). In Nevada, ranching is a mainstay business in rural counties. The levels of public interest in wild burros are high in Nevada, both from the protection and removal viewpoints. The Bureau of Land Management in Nevada has been and is involved in wild horse and burro related court litigation.

Litigations have been brought by protectionist groups seeking to stop what they view as unwarranted wild horse and burro gathering. Recent litigations have been brought by private landowners, including livestock permittees, many of whom have requested removal of wild horses from their private lands.

Since public interest is high and the wild burro program is of a controversial nature, public notification of the project will be given and public comments are solicited for a period of 30 days through this draft EA and the Draft Gold Butte Capture Plan. Comments received will be considered for the final environmental assessment.

The livestock permittee, G and F Ranches, Animal Protection Institute, National Wild Horse Association, Nevada Department of Wildlife, Lake Mead National Recreation Area- NPS, Arizona BLM, Las Vegas District BLM, and the Nevada State Office BLM have been consulted prior to this draft EA and Capture Plan.

DRAFT

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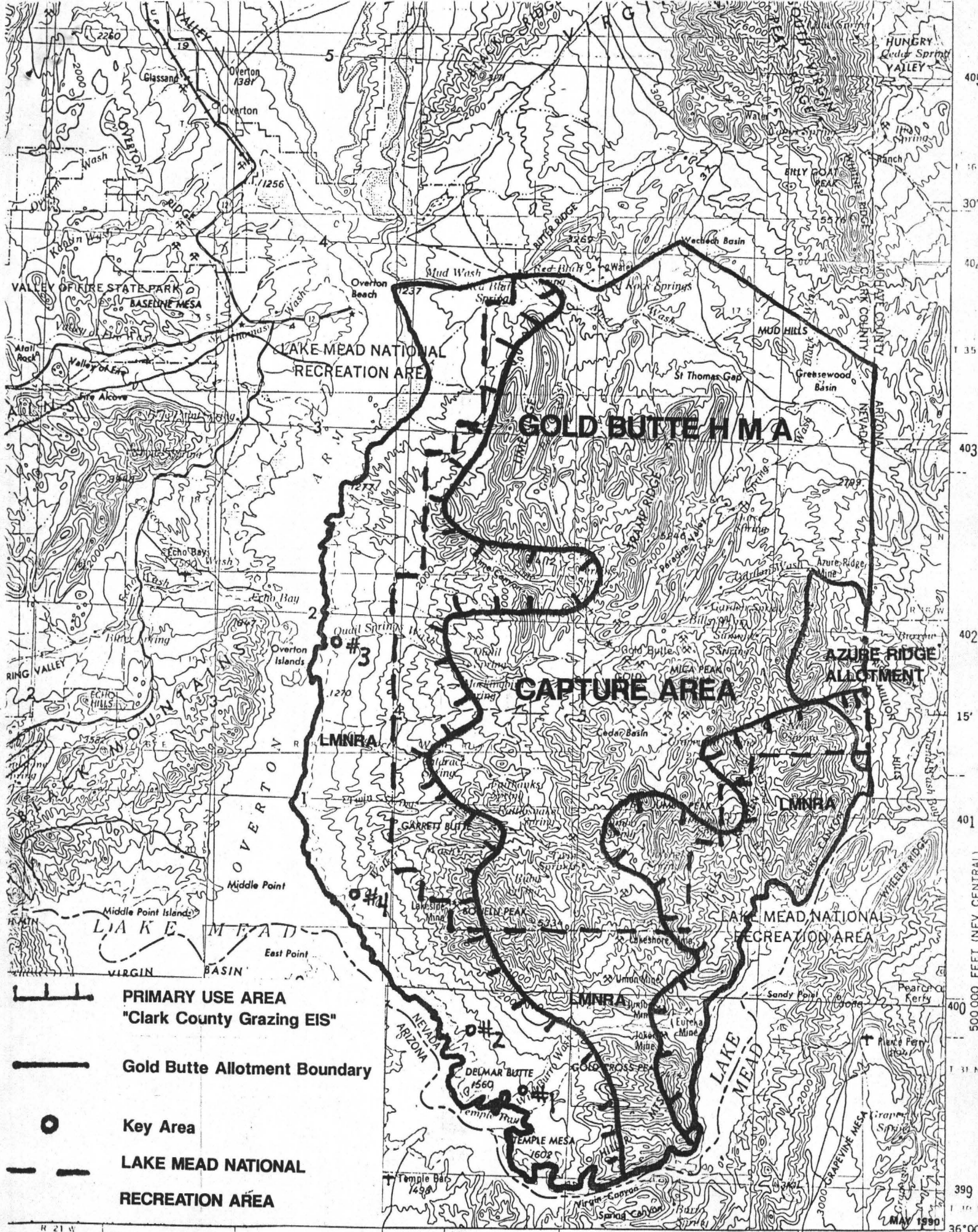
Runore Wycoff, Manager
Stateline Resource Area
Las Vegas District





Date

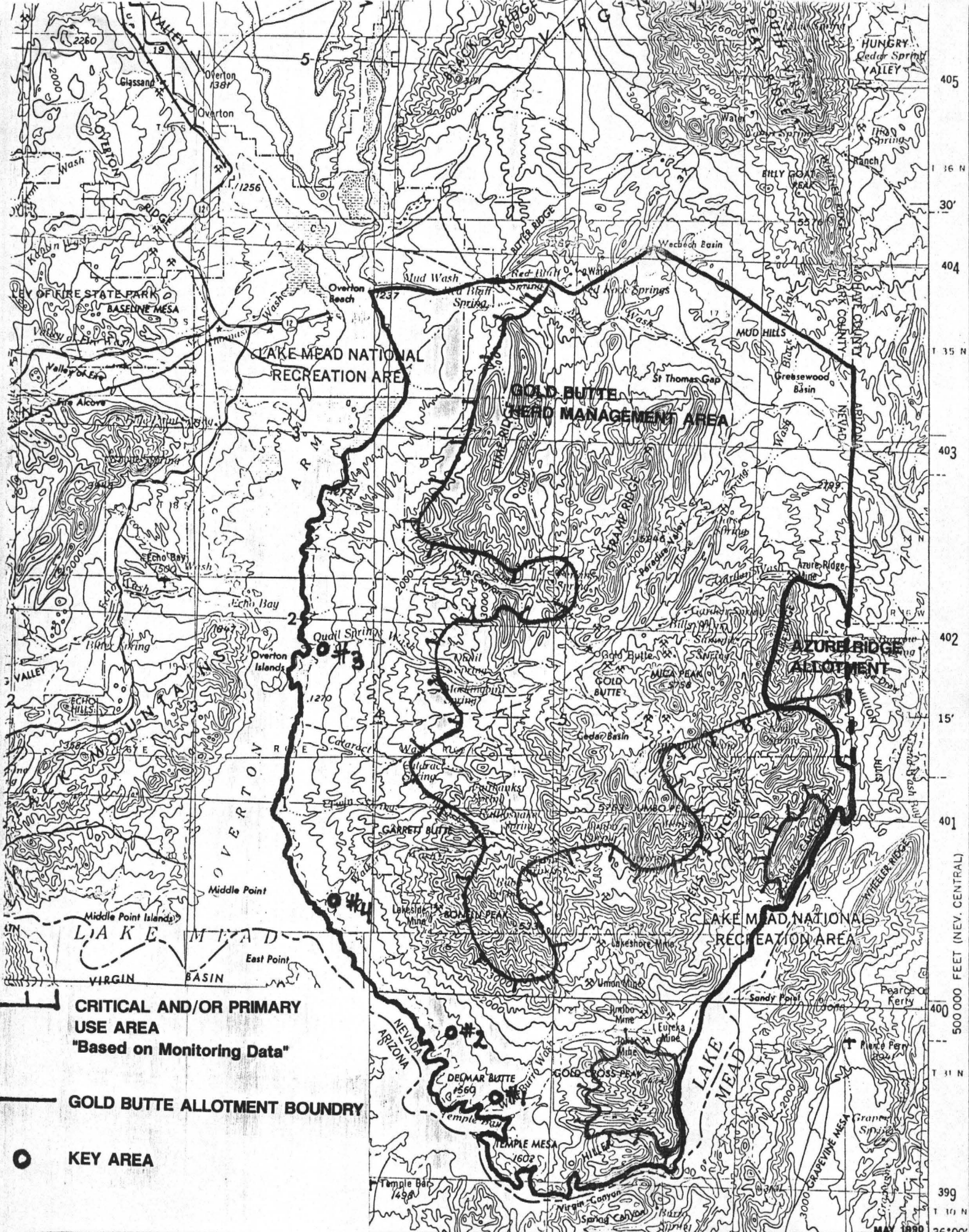
APPENDIX I

MAPS AND PHOTOGRAPHS OF GOLD BUTTE HMA

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-  PRIMARY USE AREA
"Clark County Grazing EIS"
-  Gold Butte Allotment Boundary
-  Key Area
-  LAKE MEAD NATIONAL RECREATION AREA

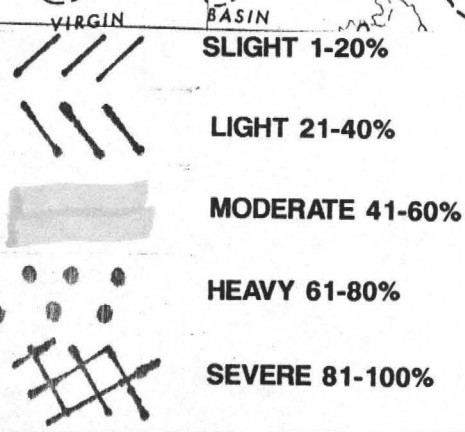
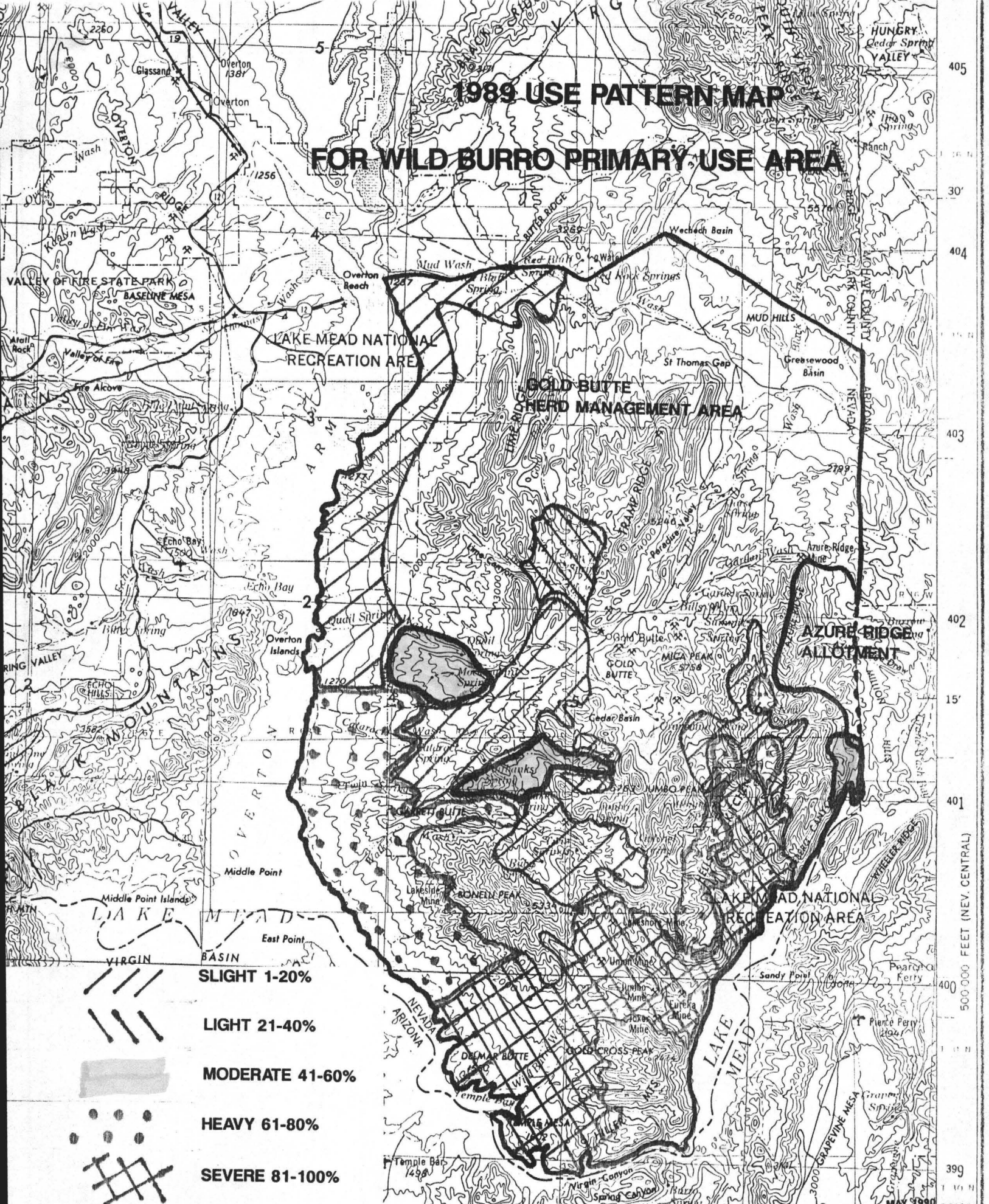


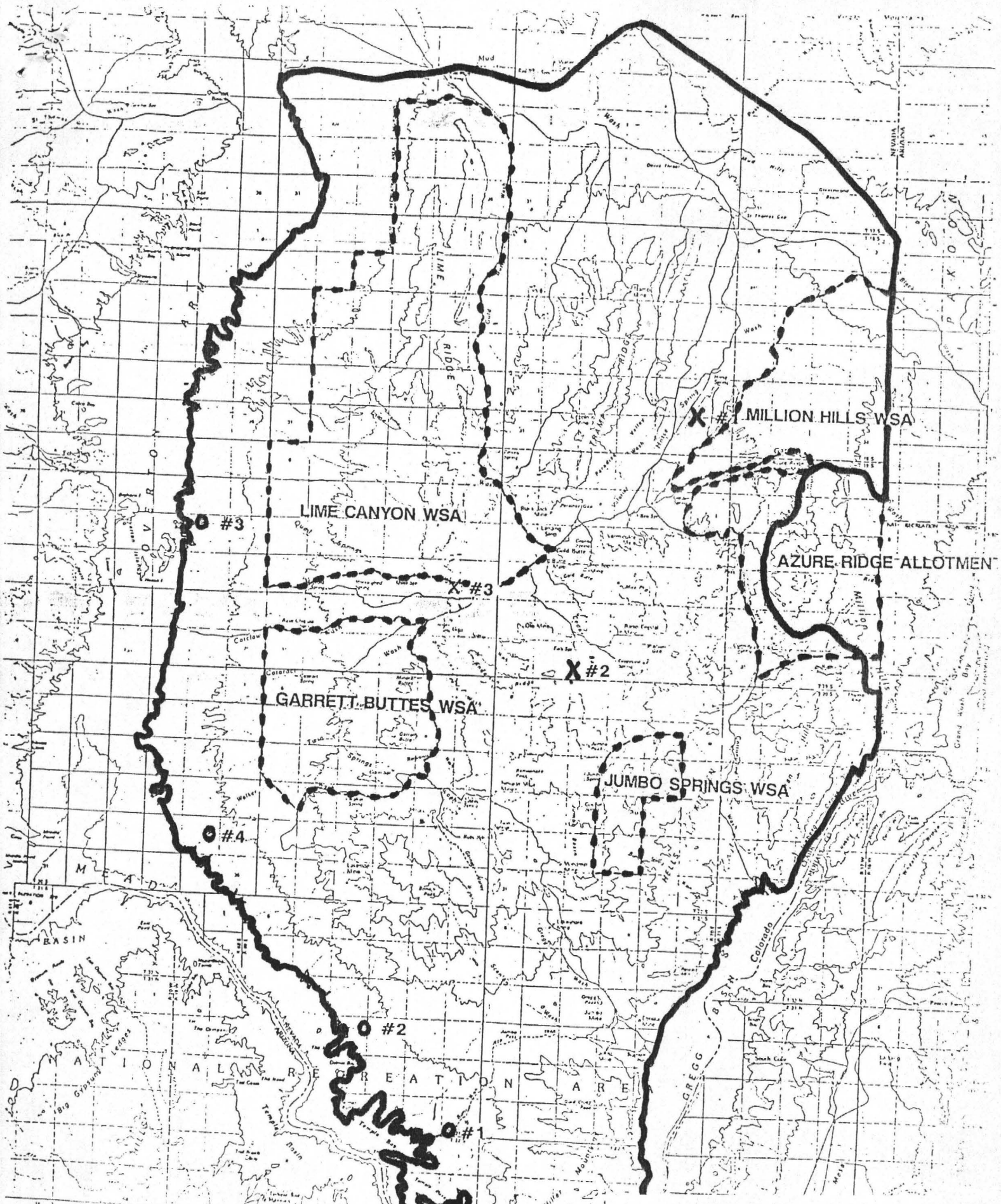
CRITICAL AND/OR PRIMARY
USE AREA
"Based on Monitoring Data"

GOLD BUTTE ALLOTMENT BOUNDRY

KEY AREA

1989 USE PATTERN MAP FOR WILD BURRO PRIMARY USE AREA

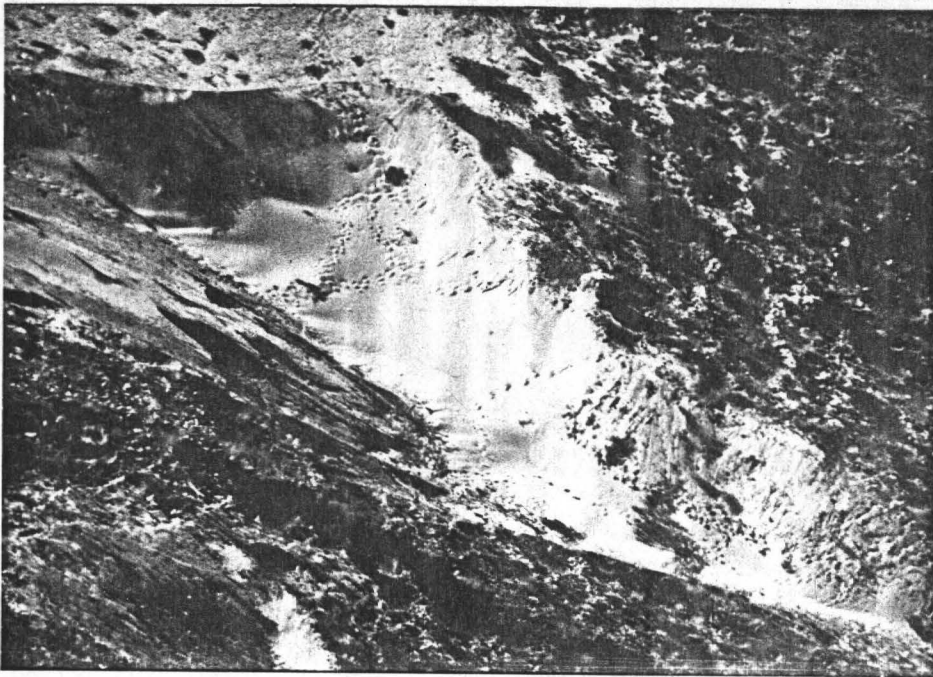




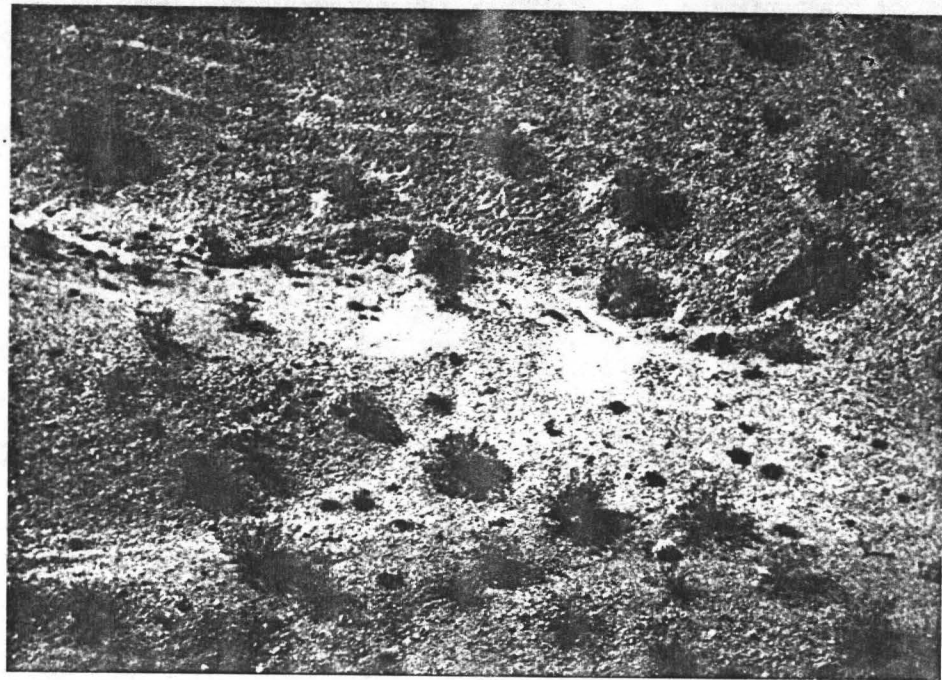
SCALE 1:250,000

GOLD BUTTE ALLOTMENT

- WILD BURRO KEY AREA
- × FREQ/TREND KEY AREA
- - - WILDERNESS STUDY AREA

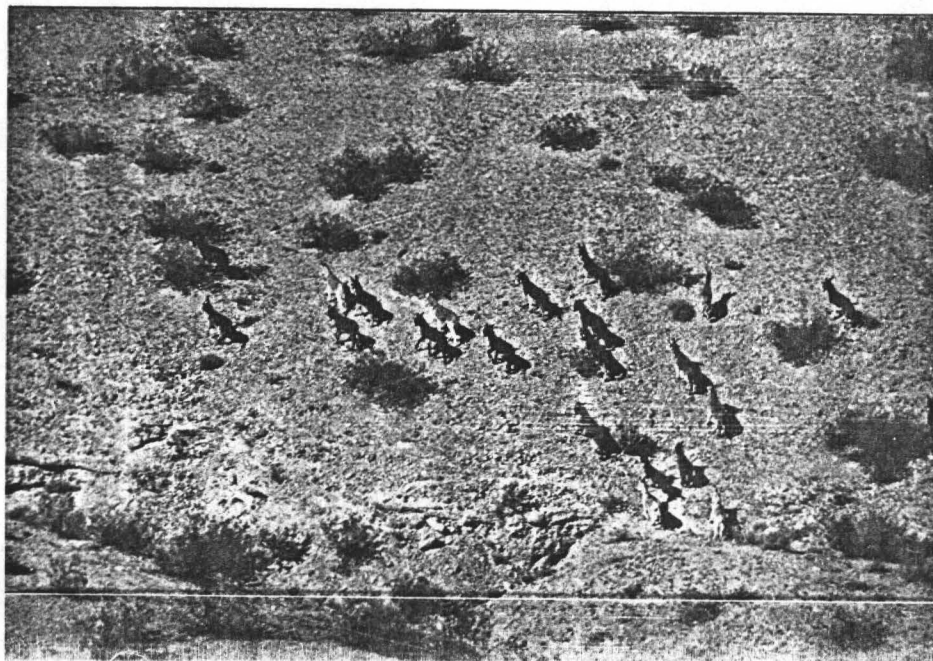


Burro tracks in this sand dune indicate very recent use by several burros. Tracks more than a few days old would not be visible in the sand.

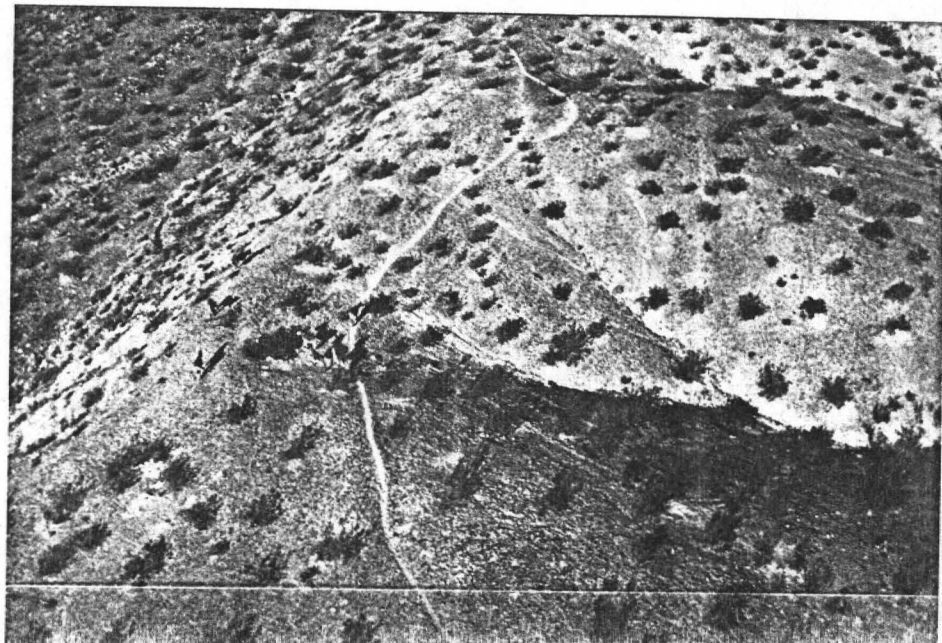


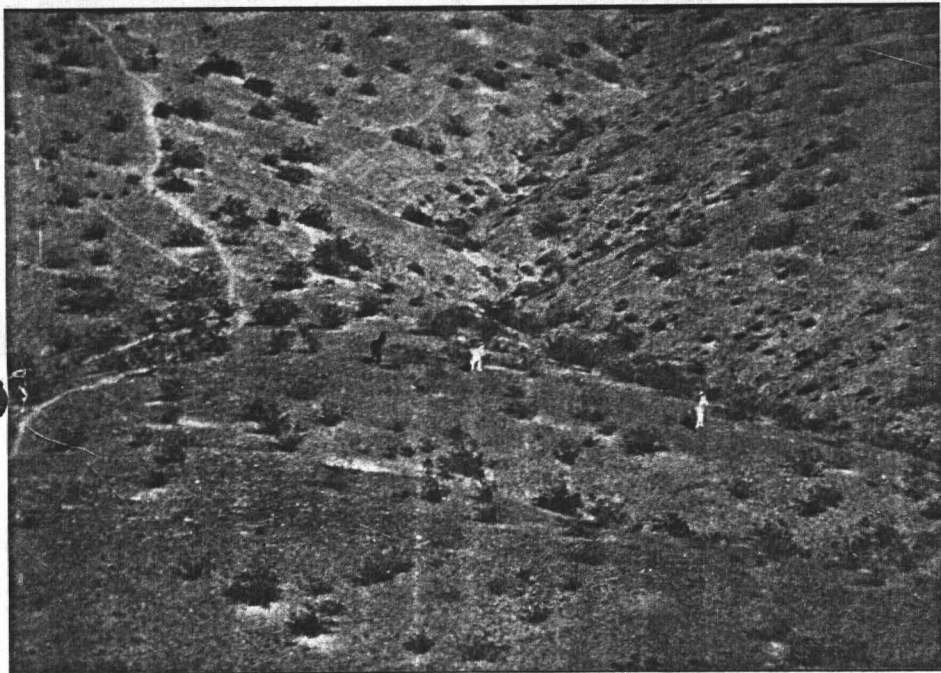
Burro "dusting areas" are common to areas of heavy use by wild burros.

A group of burros near the shore of Lake Mead in Gold Butte Allotment.

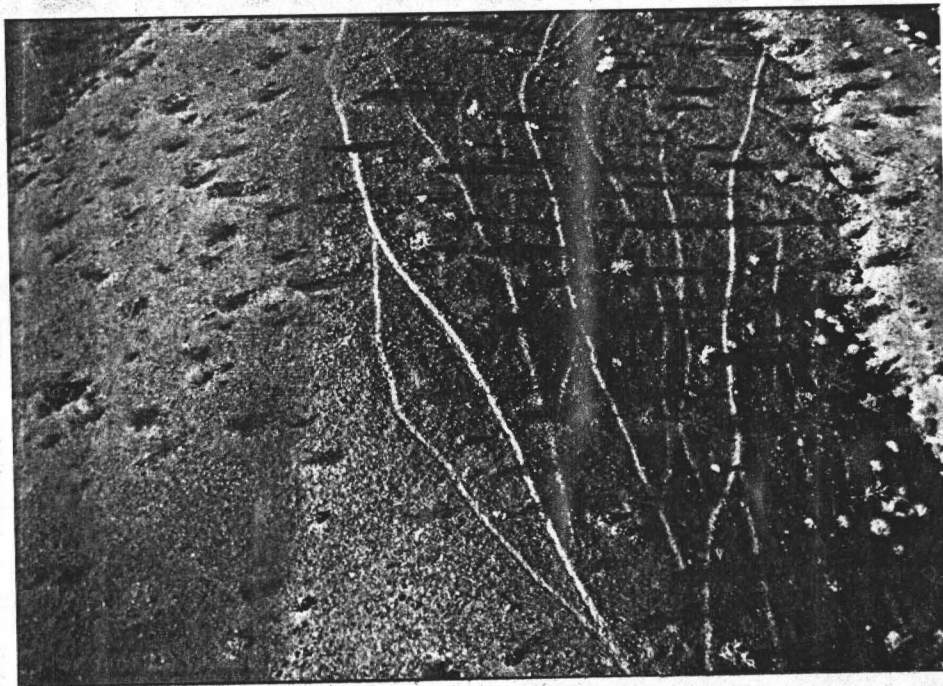


Another example of wild burro trailing typical of the areas of high burro populations in Gold Butte.





These photographs depict the heavy trailing by wild burros on Gold Butte Allotment. The highest concentrations of burros are on the southern edges of the allotment bordered by Lake Mead. The 1987 aerial census found most of the burro population in Gold Butte in these areas.



APPENDIX II

To meet the Stateline Resource Area Land Use Plan (LUP) objectives on the Gold Butte Wild Burro Herd Management Area (HMA), adjustments in the numbers of wild burros are required. The Gold Butte HMA encompasses portions of the Gold Butte and the Geyser Ranch Allotments.

The Gold Butte Monitoring Evaluation Summary indicates that heavy to severe use is occurring on approximately 53,665 acres within the primary wild burro use area. This use has been determined to be primarily from wild burros as indicated by monitoring data and field inspections.

The livestock permittee (G & F Ranches) has agreed to adjust livestock use in order to meet LUP objectives.

The Tassi-Gold Butte Herd Management Area is located in both Nevada and Arizona. The Nevada portion is administered by the Las Vegas District and the Arizona portion is administered by the Arizona Strip District.

Wild burro use is yearlong on the allotment. Most of the burro use occurs within the critical and/or primary use area. Monitoring data shows significant wild burro trailing between LMNRA and the adjacent Public Lands. The use is as follows:

ACRES BY USE CATEGORY
WITHIN THE PRIMARY USE AREA

	<u>NO USE</u>	<u>10 % USE</u>	<u>30 % USE</u>	<u>50 % USE</u>	<u>70 % USE</u>	<u>90++ % USE 1/</u>
1986	42,180	48,795	1,390	2,650	25,480	---
1988	28,030	23,930	27,805	15,550	25,180	---
1989	41,020	23,240	1,385	1,185	25,270	28,395

1/ Use on many plants was in excess of 100 percent of the current years growth with bark, branches, and woody stems being eaten on most plants.

WILD BURRO KEY AREA USE LEVELS

	<u>KEY AREA</u>	<u>AVERAGE UTILIZATION CATEGORY FOR KEY SPECIES SELECTED BY BURROS</u>
1981	BKA 1, 2, & 4	70 %
	BKA 3	30 %
1988	BKA 1, 2, & 4	90 %
	BKA 3	30 %

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In accordance with the Tassi-Gold Butte HMAP, after utilization studies are completed, carrying capacity will be determined with the following formula:

$$\frac{\text{Actual No. Burros}}{\text{Actual Utilization (\%)}} = \frac{\text{Desired No. Burros}}{\text{Desired Utilization (\%)}}$$

An example of the mathematics using 1988 key area data.

$$\begin{array}{l} 398 \text{ Burros*} \\ 90\% \end{array} = \begin{array}{l} 22 \text{ Burros} \\ .05\%** \end{array}$$

*Based on 1988 wild burro census data

**Allowable use level on key shrub species from Tassi-Gold Butte HMAP. Shrub species are key species because of the absence of any palatable grass or forbs due to degraded range. The overall preferred species by wild burros is white bursage.

ESTIMATED CARRYING CAPACITY FOR WILD BURROS
BASED ON KEY AREA AND USE PATTERN MAP DATA
APPLIED WITHIN PRIMARY USE AREA

<u>YEAR</u>	<u>DATA SOURCE</u>	<u>ESTIMATED NUMBER OF BURROS</u>
1981	KEY AREAS 1, 2, & 4	28
1981	KEY AREA 3	66
1988	KEY AREAS 1, 2, & 4	22
1988	KEY AREA 3	66
1986	USE PATTERN MAP	98
1988	USE PATTERN MAP	66
1989	USE PATTERN MAP	52
AVERAGE FOR ALL KEY AREAS		46
AVERAGE FOR ALL USE PATTERN MAPS		72

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Conclusions of the Gold Butte Allotment Evaluation were based upon data collected from the following sources:

1. Range, wildlife, soil, water and air, wilderness, and wild burro monitoring files compiled by the Stateline Resource Area office since 1981.

2. Input from G and F Ranches, permittee; John Frei, ranch manager; at meetings in 1988, 1989 and 1990.
3. Input from Nevada Department of Wildlife in 1989 and 1990.

A more detailed analysis is available in the Gold Butte Allotment Evaluation Summary on file at the Las Vegas District Office. Use pattern mapping for the Gold Butte Allotment/Tassi-Gold Butte HMA is displayed on an overlay registered to a base map and is available at the Las Vegas District Office.

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