

Las Vegas Dist. 1-6-85
WHOA!

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WILD HORSE ORGANIZED ASSISTANCE
INC.

A Foundation for the Welfare of
Wild Free-Roaming Horses and Burros

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In Memoriam

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

January 6, 1985

Mr. Kemp Conn, District Manager
Bureau of Land Management
Post Office Box 26569
Las Vegas, Nevada 89126

Re: ESMERALDA-SOUTHERN NYE PLANNING AREA

Dear Mr. Conn:

Thank you for the opportunity to comment on the Draft Esmeralda-Southern Nye Resource Management Plan and Environmental Impact Statement. WHOA is pessimistic that this process will change the status quo, however, for administrative purposes we submit our comments for consideration in the final land use plan. WHOA is numb from the numerous plans, but this one was the hardest to digest. We are thankful for the summary, which simplified a hard to track document.

LIVESTOCK

WHOA supports Alternative B for livestock grazing. The preferred alternative only maintains what is a policy of no action and monitoring. Range improvements for livestock grazing on public lands, with taxpayer dollars, should be constructed only after monitoring shows the need. The projects must be multiple use. Any waters developed on public land with tax dollars must benefit multiple use, including wild horses, and any improvements with private dollars on public lands must have stipulations on the permits for multiple use, including wild horses. The establishment of sufficient monitoring studies to attribute use to the particular animals, to the extent possible. Should the offender of over grazing be livestock, the reductions should be made in livestock. Should the offender be wild horses, the reduction in wild horses. Should the offense come from both the reductions should be made on a pro-rata basis.

MONITORING Will sufficient funds be available to carry out the monitoring program so that further down the road we are not looking at the same problems as now? Who will read the monitoring studies and how often will they be read?



WILDLIFE

WHOA supports ALTERNATIVE B for wildlife, with monitoring providing adjustments in wild horses and livestock as data requires. Should adjustments be necessary they should be made first in critical wildlife habitat first.

WILDERNESS

Wilderness enhances and protects wildlife and wild horse habitat. WHOA supports ALTERNATIVE A for wilderness. Wild horse management plans must be an integral part of the proposed package to Congress as part of the existing use.

LAND TENURE

WHOA supports ALTERNATIVE A as the need arises. Ample opportunity exists for community expansion and agricultural development without seeking relief from that system.

CORRIDORS

WHOA supports ALTERNATIVE A as the need arises.

WILD HORSES

Wild horse habitat is quickly diminishing overall due to livestock operators and private lands. Horses reside in only 30% of the State of Nevada, and that is being reduced significantly. WHOA has agreed in the past to reductions of wild horses, however, we believe that any further reductions should be based on range data that substantiates the need. That means proper monitorings that attribute use to the particular animal to the extent possible. The law not only requires you protect, management and control the wild horse; but that the BLM also shall provide for their biological needs, one of which is water. All waters on public lands must be for multiple use purposes or stipulations on the permits to provide water for wild horses.

Most sincerely,

Dawn Y. Lappin (Mrs.)
Director