3/20/91



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CHARLOTTE L. B. PARKS

ANIMAL PROTECTION INSTITUTE OF AMERICA

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Nellis

March 20, 1991

Billy Templeton State Director Nevada BLM 850 Harvard Way Reno, NV 89520

WILD HORSE MANAGEMENT

COPY FOR YOUR

Dear Mr. Templeton:

Speaking for our national membership, API has been involved with the wild horses of Nevada since the early 1970's. As you know, we are most recently involved with the controversies in Nellis.

In the course of this controversy, many things arise that are disturbing to us. One of these is the fact the 1991 Removal Plan was issued as a final decision, rather than as a proposal in the regular administrative process. This breach of established procedure was so curious, peculiar, and out of the ordinary, we protested immediately.

When we called the Nevada State Office to ask how could the program leader be so asleep on the job, we were told Milt Frei left his position as program leader and no one was operating in the capacity of overseeing the program.

Preventing this kind of snafu of policy and procedure was the crux of his job! From our point of view, his greatest forte was his ability to explain policy, procedure, and regulations to the public while at the same time keeping the Resource Areas and Districts in line with the law, regulations, policies, Instructional Memos, and established procedures.

Now we understand that the State of Nevada is not only operating without its wild horse program leader, it is eliminating that part of the job by putting all power and authority for removals in the Districts without <u>accountability</u> to the State Office at all. We see that as fragmenting the program, not integrating it as directed by NEPA.

We request an explanation, in writing, for the changes in responsibilities and shift to the District of that point of accountability which NSO had previously maintained. The Nellis Removal Plan is a perfect example of why the program leader in the State Office is needed to act as a coordinator and integrator. The very first removal under what appears to be a new state policy to fragment and dismantle that point of accountability failed. The position of the State program leader is needed, especially one with Fries' field experience with wild horses/burros and understanding of their biological needs, population dynamics, and habitat; his range management background; his grasp of the law and BLM range policies; and equally important, his understanding of the overall history and continuity of the protection program since its inception. It is our understanding that these were the very things that originally qualified him for that position in Nevada and that was in response to public interest group demands--including API. We would like to see your wild horse program leader reinstated because API continues to think those are exactly the things needed for implementing the Wild, Free-Roaming Horse and Burro Protection Act in Nevada.

FOR THE ANIMAL PROTECTION INSTITUTE OF AMERICA

Sincerely,

anay Whetaker Nancy Maitaker

Assistant Director of Public Land Issues, Specializing in Wild Horses

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