

# W H O A

WILD HORSE ORGANIZED ASSISTANCE  
P.O. BOX 555  
RENO, NEVADA 89504

Red Rock

6-1-94



a note from

Dawn Y. Lappin

*1 faxed  
6-1-94  
7:05pm*

June 1, 1994

Dave Wolf, Conservation Area Manager  
Bureau of Land Management  
Red Rock Canyon National Conservation Area  
4765 Vegas Drive  
Box 26569  
Las Vegas, Nevada 89126

Dear Mr. Wolf,

Thank you for the opportunity to review and comment on the Red Rock Canyon National Conservation Area (NCA), Proposed General Management Plan (GMP), and the Environmental Analysis of the Proposed Plan and Alternatives. We were unable to attend either of the open houses or public hearing but are providing comments which we would want considered prior to issuing the final plan.

We commend the plan to fence the highway for safety as well as provide underpasses to allow horses and burros their freedom of movement. We would request assurances that when the work is eventually being initiated and completed, which should take quite a long time, that horses and burros be monitored during this action to assure that they are not restricted from movement and access to water.

However, we have some serious concerns with the management of the wild horses and burros in this area.

**Page 7, Issue Statements, 8.**

"8. How should wild horses and burros be managed."

The issue of "how" wild horses and burros will be managed has already been established, they will be managed for a thriving natural ecological balance with their habitat within the framework of multiple use. This HMA only differs from others in that tourists and highways are fragmenting and disrupting their area of use. According to the information provided in this document it shows that the Bureau and the Nevada Division of State Parks has ignored the needs and protection of the wild horses and burros up to this point.

Dave Wolf, Conservation Area Manager  
June 1, 1994  
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**Page 34, Actions, 1.**

You have established an AML of 50 of each, wild horses and burros, in the NCA portion of the HMA according to the AML from the Draft Stateline RMP and preliminary results from vegetation studies. According to the IBLA decision in 1989, numbers established for administrative reasons were negated and the ruling required that new AML's be established according to monitoring data to achieve a thriving natural ecological balance. Therefore, we believe you are premature in establishing an AML for the areas and must protest your selection of those numbers unless justified with monitoring data. In addition, the numbers must be established from data, not arbitrarily taking numbers from the RMP and then justifying those original numbers for convenience sake. As an example, you must establish carrying capacity according to the monitoring data, establish a thriving natural ecological balance between all users, and then distribute AUM's accordingly. This document leads the reader to believe the old RMP numbers were selected for convenience and that data will be supplied to justify that old number which has been negated since 1989. Please provide us with the area land use, distribution, census, utilization mapping, and habitat evaluations that established the carrying capacity for the RRCNCA.

**Page 136, Wild Horses and Burros**

We find it extremely hard to understand your justification of numbers in the HMA. This is part of an HMA but this document is so lacking in informed and accurate data concerning wild horses and burros. Is anybody there in charge of this HMA or responsible for the collection of data? Why has the area not been censused since 1989? In addition, with the information you've supplied and doing the math for animals killed and removed, that would put your population at around 20 animals. When did the BLM relegate their responsibility for censusing to "a group of riders?" Where is the methodology in the counting? It appears that management has been by removal of nuisance animals rather than management of the HMA and interrelated areas for the correlation of the herds and with their habitat requirements.

By law the BLM is responsible for the welfare of the wild horses in Nevada as well as the management of the herd areas. It appears from the lack of information contained in this document that this area has apparently been ignored, except for nuisance removal, for many years and that the Bureau hasn't a clue what is happening to the herds located in the RRCNCA.

We regret that we have not been able to provide any positive comments on the wild horse and burro management portion of this document but we feel that for the reasons stated above the animals have not been seriously considered.

Dave Wolf, Conservation Area Manager  
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Page 3

The fact that this is the initiative for a new management plan for the area which includes portions of an HMA should be the opportunity for the agencies to develop a Herd Management Area Plan. Development of that plan would address the needs and concerns for the herds which is the responsibility of the Bureau, rather than refer to them as an afterthought.

Please send us the information requested above for review and comment if you are intending to establish an AML in this portion of the HMA. Establishment of an AML within a herd area requires review of the monitoring data, proposed decisions and final decisions.

If you have any questions, please feel free to call. Also, if you will be in the Reno area at some time, please allow time for a meeting with us to discuss this proposal.

Sincerely,



DAWN Y. LAPPIN  
Director

cc: GARY RYAN

BOB MILLER  
Governor

STATE OF NEVADA

m 6-1-94

CATHERINE BARCOMB  
Executive Director



**COMMISSION FOR THE  
PRESERVATION OF WILD HORSES**

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Executive Director

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