



Nellis

12-73-91

IN REPLY REFER TO:

United States Department of the Interior

BUREAU OF LAND MANAGEMENT

CALIENTE RESOURCE AREA

P.O. Box 237

Caliente, Nevada 89008

4720
NV-055.14

(702) 726-3141

Nevada Commission for the
Preservation of Wild Horses
Stewart Facility
Capitol Complex
Carson City, NV 89710

DEC 23 1991

Dear Cathy,

This letter is in response to your comments and request for further information regarding the proposed wild horse removals from the Nellis Air Force Range (NAFR).

You stated a concern over our methodology used to estimate the wild horse population. I have attached a copy of Jule Wadsworth's census report, showing how the population estimate was derived. The Lincoln Index is a common method of estimating population numbers. The wording in the environmental assessment has been clarified to show that the population number is an estimate.

You expressed concern that too many horses may be removed. In our most recent census (September 1991), we made an actual count of 3,583 wild horses within the NAFR. Based upon data from our 1991 capture, we know that at least 581 of those wild horses are over ten years old. Our projected funding levels for the planned 1992 gather will allow us to remove 1,500 wild horses. The balance will still exceed the number of wild horses that should remain to support a thriving natural ecological balance. With our present handling methods, which include marking released horses, we will have an actual count of the horses that remain when we reach the appropriate management level. I don't anticipate any problems with removing too many horses.

You expressed a concern about monitoring. Monitoring is an ongoing process; we monitor critical water sources, forage and animal condition.

Water monitoring is conducted at three levels of intensity, based upon climatic conditions. It could be weekly, monthly, bi-monthly or quarterly. Because Air Force personnel are on the range daily, we rely upon them to notify us when there appears to be a water shortage. Upon receiving a reported shortage, we investigate conditions and make an assessment. Appropriate actions include making repairs to a damaged facility, increasing the frequency of monitoring, requesting the Air Force to haul water and conducting removals.

Forage monitoring is conducted at two levels of intensity. Formal vegetative studies that are conducted on a cyclical basis, either annually or every fifth year. Informal monitoring occurs whenever the wild horse and burro specialist or other qualified Bureau employee visit the NAFR.

Animal condition is conducted at two levels. Under normal conditions, visual observations by Bureau employees and/or Air Force personnel results in an initial judgement that animals are in good, fair or poor condition. When animals are judged to be in a stress condition, veterinarian expertise is obtained.

A summary of monitoring results is included in the Environmental Assessment (EA).

In your letter you express concern about water and water developments. A summary of water sources and flow data is included in the EA. Major water sources within the critical summer range have been repaired or improved during the previous 2 years. Maintenance is an ongoing process which will occur regardless of whether we gather wild horses or not.

You bring up the question of additional water development. Additional water development will not solve the problem of too many numbers. Vegetative data indicates that severe use is occurring 15 miles from perennial water sources and over 800 square miles of the vegetative resource are severely used. This level of use is excessive and unconscionable from a resource management point of view. Additional water development will only move the problem not solve it.

Continued drought conditions have decreased the amount of water available for horses. Some spring sources ceased to flow during the summer months (1991). Repair and improvement do very little when there is no water to flow into the trough.

You questioned in your letter why ship horses to Kingman, AZ. The option to ship to Kingman increases the flexibility of the gather plan. This flexibility becomes invaluable when dealing with unforeseen circumstances. Your question concerning shipment of young foals has been addressed in the final document.

Our monitoring data for Nellis are periodically consolidated and presented to the public through a herd management area evaluation. We have provided you and WHOA with copies in the past and intend to continue doing so. I don't consider it to be cost effective to send copies of every data report to you or all of the other organizations that have an interest in the Nellis Herd. If you have interest in a specific time or instance, we can provide you with that data.

Thank you for taking the time to respond to our request for comments. I hope this letter has provided the information you desired. If you have further questions, please contact Jule Wadsworth at the above address.

Sincerely,
"Acting" *Larry Lee Smith*
for Curtis G. Tucker
Area Manager

Enclosure - Census Memo

Nellis

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12-20-91



United States Department of the Interior



BUREAU OF LAND MANAGEMENT
LAS VEGAS DISTRICT OFFICE
4765 VEGAS DRIVE
P.O. BOX 26569
LAS VEGAS, NEVADA 89126

IN REPLY REFER TO:

4700
(NV-931.3)

Commission for the Preservation of
Wild Horses and Burros
c/o Ms. Cathy Barcomb, Executive Director
Stewart Facility
5500 Snider Avenue,
Bldg. 6, Room 137
Carson City, NV 89710

DEC 20 1991

Dear Ms. Barcomb:

The Bureau of Land Management proposes to gather excess wild horses and burros from public lands in the State of Nevada no sooner than 28 days from the date of this letter.

The proposed gathering will be conducted in the Las Vegas District in the areas shown on the enclosed maps and as described below.

<u>Herd Management Area/Herd Area Name</u>	<u>Environmental Analysis Record Number</u>	<u>Reason for Gathering</u>	<u>Approximate Number to be Removed</u>	<u>Approximate Number to Remain</u>
Nellis Air Force Range	NV-055-02-01	Attain thriving ecological balance	1,500	2,083

Sincerely,

Ben F. Collins
District Manager

1 Enclosure

1. Map of Nellis Air Force Range Gathering Area (1 p)

CC:

SD, NV-910
Palomino Valley Corral Manager