

NEVADA STATE CLEARINGHOUSE

Department of Administration
Budget and Planning Division
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7/13/04

*NDDO
Comments*

DATE: July 13, 2004

Governor's Office
Agency for Nuclear Projects
Energy Office
Agriculture Department
Minerals Commission
UNR Bureau of Mines
Economic Development
Tourism
Fire Marshal
Human Resources
Health Division
Indian Commission
Colorado River Commission
Animal Damage Control

Legislative Counsel Bureau
PUC
Transportation (General)
Transportation (Airspace)
Office of Traffic Safety
UNR Library
UNLV Library
Historic Preservation
Emergency Management
Office of the Attorney General
Washington Office
Nevada Assoc. of Counties
Nevada League of Cities
Public Safety

Conservation & Natural Resources -
Director's Office
State Lands
Environmental Protection
Forestry
Conservation Districts
State Parks
Water Resources
Natural Heritage Program
Wild Horse Commission
Wildlife Department - Director's Office
Region 1 - Fallon
Region 2 - Elko
Region 3 - Las Vegas

Nevada SAI # E2005-011

Project: Record of Decision Nevada Test & Training Range Resource Management Plan and FEIS

NELLIS

Yes No Send more information on this project as it becomes available.

CLEARINGHOUSE NOTES

Enclosed, for your review and comment, is a copy of the above-mentioned project. Please evaluate it with respect to its effect on your plans and programs; the importance of its contribution to state and/or local areawide goals and objectives; and its accord with any applicable laws, orders or regulations with which you are familiar.

Please submit your comments no later than **August 16, 2004**. Use the space below for short comments. If significant comments are provided, please use agency letterhead and include the Nevada SAI number and comment due date for our reference. Questions? Michael Stafford, Clearinghouse Coordinator, (775) 684-0209 or mstafford@budget.state.nv.us.

THIS SECTION TO BE COMPLETED BY REVIEW AGENCY:

- No comment on this project
- Proposal supported as written
- Additional information below
- Conference desired (See below)
- Conditional support (See below)
- Disapproval (Explain below)

AGENCY COMMENTS:

The Department is not opposed to wild horse management on the Nellis NTTR. And, we agree with the BLM that reduction in the appropriate management level (AML) is necessary to manage the wild horse population in a thriving natural ecological balance with other multiple uses and natural resources, especially the prime directive of the Nellis NTTR, wildlife and their habitats. However, we remain fundamentally steadfast in our opposition to adoption of the Nellis NTTR RMP/FEIS and the supporting Record of Decision for the following reasons:

- Expansion of the Herd Management Area (HMA) is well beyond the combined boundaries of the Nevada Wild Horse Range and 1971 Horse Use Area delineated in the 1992 Nellis RMP ROD without offering compelling justification for the expansion;
- Despite the reduced AML target, a dangerous precedent has been adopted legitimizing expanded use of the NTTR by wild horses without forage and water data based on appropriate monitoring methods. This encourages continued, unmeasurable competition between wild horse and wildlife for forage and water, and the resultant, broader ecological consequences remaining unknown;
- Development of water sources where water was not previously available (e.g. Cactus Spring to Cactus Flat) to benefit wild horses in their present distribution encourages further expansion of horses beyond the "core area" defined by BLM.

These reasons underscore why the present Nellis NTTR RMP/FEIS and ROD are not consistent with the intent of the Wild and Free-Roaming Horse and Burro Act of 1971 of which the State of Nevada has parallel commitments as asserted in NRS 504.