3/16/81

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WILD HORSE ORGANIZED ASSISTANCE INC. A Foundation for the Welfare of Wild Free-Roaming Horses and Burros

March 16, 1981

P. O. Box 555 Reno, Nevada 89504 Telephone 323-5908 Area Code 702

Mr. Edward F. Spang, State Director Bureau of Land Management Department of the Interior 300 Booth Street Post Office Box 12000 Reno, Nevada 89520

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Dear Mr. Spang:

We would greatly appreciate some explanation of policy from the State Office as to the computation figures currently being used by your Districts.

The following information was obtained from the Battle Mountain District's draft Environmental Assessment (EA) and proposed action to eliminate overutilization of forage by reduction in wild horse numbers.

To give the Bureau the "benefit of doubt" we have assumed several factors not occurring in reality.

#1. that all colts live to enter the base population figures

#2. that all mares foal in April

JANUARY 1978 inventory

Total population 545 = 6540 AUMs 490/55 adult/foal ratio 490 x 12 = 5880 AUMs + 2 mos. x 55 colts = 5990 of actual use 6540 AUMs - <u>5990</u> 550 AUMs in excess

OCTOBER 1979 inventory

Total population 734 = 8808 AUMs 587/147 adult/foal ratio 587 x 12 = 5880 AUMs + 2mos. x 147 colts = 7044 of actual use 8808 AUMs - 7044 1470 AUMs in excess Page two

NOVEMBER 1980 inventory

Total population 691 = 8292 AUMs 553/138 adult/foal ratio 553 x 12 = 6636 AUMs + 2 mos. x 138 colts = 6912 of actual use 8292 AUMs $- \frac{6912}{1380}$ AUMs in excess

THUS: 1978 (550 AUMs) + 1979 (1470 AUMs) + 1980 (1380 AUMs)= 3400 AUMs NOT used by wild horses.

In the three inventories cited in the EA, we have computed nearly 3400 AUMs of forage that were NOT consumed by wild horses. We quite naturally recognize that some portion of that colt crop will enter the adult population at 6 months of age and therefore add to the amount of the forage actually consumed the previous year.

Our question then, quite naturally is, why is the Bureau inflating amounts of forage consumed, making the wild horse cases actually appear worse? If it is possible to use estimates on which to base wild horse forage consumption, then we assume it is possible to use the same computations for the typical cow/calf operation; wherein the population is geared for production--usually 80% female. And as the EA admits are also on the range yearlong.

Looking forward to a timely response.

Most sincerely,

Dawn Y. Lappin (Mrs.) Director

DYL/rl

cc: Board of Trustees Battle Mountain District