BATTLE MTN ESTIMATE 1995

WHOA
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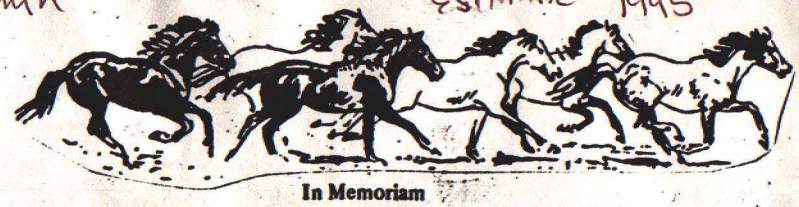

In Memoriam
LOUISE C. HARRISON
VELMA B. JOHNSTON, "Wild Horse Annie"
GERTRUDE BRONN

Wild Horse Organized Assistance, Incorporated, (hereafter WHOA) hereby moves for summary judgement in our appeal of the Final Multiple Use Decision for the Roberts Mountain Allotment (hereafter allotment). WHOA holds that the Bureau of Land Management (hereafter BLM) improperly assessed and calculated the amount of forage available on the allotment, and then imposed too great a proportionate share of the grazing reduction to wild horses within the allotment.

BLM determined in the Roberts Mountain Allotment Evaluation, June 1994, that some overgrazing was occurring on the allotment, and must be eliminated. WHOA concurs that overgrazing was occurring, but disagrees with the manner in which the reduction of grazing is calculated. WHOA reviewed arguments set forth by the Commission for the Preservation of Wild Horses andfully concurs with the arguments contained therein. To reduce the repetition in similar arguments WHOA submits brief points and supports the elongated arguments presented by the Commission.

1. CALCULATION FORMULA ERROR

According to the Nevada Rangeland Monitoring Handbook, page 4,grazing use records of *actual* grazing use by livestock and wild horses should be maintained to help make adjustments in use. Furthermore, Rangeland Monitoring Handbook Studies (TR4400-3),Section 1, paragraph 1, Utilization data 1`.1 and 1.2 state ".....utilization data are considered with **actual use** and climate data to determine resource use levels and to identify needed adjustments in management actions." This caculation is as follows:

$$\frac{\text{ACTUAL USE}}{\text{ACTUAL UTILIZATION}} = \frac{\text{DESIRED ACTUAL USE}}{\text{DESIRED UTILIZATION}}$$

The expressions of actual versus desired are known values, derived from monitoring the vegetation.

2. INCONSISTANT DATA FOR CALCULATIONS

BLM's calculated the amount of total grazing reduction needed, yet mysteriously adds wildlife AUM's, when they had already stated that there was no indication of wildlife contributing to the damage.

livestock	-	active preference	13,238
wild horses	-	actual use	1,548
wildlife	-	actual use	1,228
TOTAL DEMAND			16,014

But on the same page BLM presents *actual use* table as follows:

livestock	-	actual use	11,362
wild horses	-	actual use	1,548
wildlife	-	actual use	1,228
TOTAL DEMAND			14,138

The *actual use* table is abandoned by the BLM.

3. WEIGHTED AVERAGING

Objectives for land use plans were designed to solve rangeland problems, the most critical of which is those areas where animals *like* to be. It is baffling how you can solve a overgrazing issue on that one over used portion by averaging it with those areas the animals do not like to go. Yes, you can correct it with several measures, reduction, movement, or season of use; but the area still started out with overuse. If you average three years of monitoring over the entire allotment, that severe use percentage will be significantly reduced, but it will not change the fact that one portion got severe use.

4. ALLOCATION OF FORAGE

According to BLM's data, livestock consume approximately 80.4% of the forage, wild horses 10.9%; we assume the 8.7% is wildlife. Using the actual use percentage data for each grazer should produce the amount of forage each user would be reduced.

In conclusion, WHOA supports the consistant collection and use of monitoring data, and desires to support meaningful decisions that reverse range damage occurring from any species.

Thank you.

Most sincerely,

Dawn Y. Lappin

Dawn Y. Lappin (Mrs.)
Director