



United States Department of the Interior

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✓ 1/30/95  
IN REPLY REFER TO:  
4700  
(NV-03840)

JAN 30 1995

Dear Interested Party:

Enclosed is a draft Herd Management Area Plan/Capture Plan and Environmental Assessment (EA) for the South Stillwater Herd Management Area. This Environmental Assessment does not become final until the Finding of No Significant Impact/Decision Record is signed. Please submit your comments to this office by close of business March 6, 1995, to be considered.

Sincerely yours,

John O. Singlaub  
District Manager

*plan doesn't identify  
how many animals are  
to be removed.*

**SOUTH STILLWATER HERD MANAGEMENT AREA PLAN**

**(DRAFT)**

## Table of Contents

I. <u>Resource and Background Information</u>	3
A. <u>Introduction</u>	3
B. <u>Background and History</u>	3
C. <u>Land Use Plan Objectives and Constraints</u>	3
D. <u>Other Activity Plans, Issues and Constraints</u>	4
1. <u>Multiple Use Decision 1993</u>	4
2. <u>Range Program Summary Update, 1989</u>	4
3. <u>Stillwater Wildlife Habitat Management Plan</u>	5
4. <u>Mt. Well La Plata Allotment Management Plan</u>	5
E. <u>Wild Horses</u>	6
F. <u>Livestock Use</u>	7
G. <u>Wildlife Use</u>	7
H. <u>Soils and Vegetation</u>	7
I. <u>Recreation</u>	7
J. <u>Range Improvements</u>	8
K. <u>Water and Riparian</u>	8
L. <u>Other Activities</u>	8
M. <u>Wilderness</u>	8
N. <u>Cultural Resources</u>	8
O. <u>Issue and Problem Summary</u>	8
II. <u>Objectives and Management Methods</u>	8
A. <u>Animal Objectives</u>	8
B. <u>Habitat Objectives</u>	10
III. <u>Management Evaluation and Revision</u>	11
A. <u>Animal Studies</u>	11
B. <u>Habitat Studies</u>	11
C. <u>Evaluation</u>	12
IV. <u>Funding</u>	13
V. ENVIRONMENTAL ASSESSMENT	14
A. <u>INTRODUCTION AND PURPOSE</u>	14
B. <u>DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES</u>	14
C. <u>AFFECTED ENVIRONMENT</u>	15
D. <u>ENVIRONMENTAL IMPACTS</u>	15
E. <u>Coordination and Consultation</u>	18
VI. <u>List of Preparers</u>	
VII. FINDING OF NO SIGNIFICANT IMPACT AND DECISION RECORD	21

VIII. Literature Cited	23
Map of Herd Management Area	25
Appendix 1 Animal Numbers	32
Appendix 2 Utilization Levels and Monitoring Schedule	33
Appendix 3 Removal Procedures	34

## I. Resource and Background Information

### A. Introduction

This plan presents management direction for the South Stillwater Herd Management Area (HMA). The terms horse and wild horse, both (Equus caballus) are used synonymously throughout this document.

In June of 1992 the Director of the BLM signed the Strategic Plan for Management of Wild Horses and Burros on Public Lands. This document provides goals and objectives for the management of wild horses and burros.

The authority for the proposed actions within this plan is contained in 43 CFR 4710.2, 4710.4, 4720.1, 4740.1, 4740.2 and the Wild Horse and Burro Act of 1971 (Public Law 92-195)

### B. Background and History

The South Stillwater Herd Management Area is located approximately 30 miles east of Fallon Nevada. Map 1 shows the Herd Management Area boundary.

It is generally accepted that these wild horses originated from escaped ranch stock.

The predominant vegetation consists of Wyoming big sage (Artemisia tridentata), juniper (Juniperus osteosperma), bottlebrush squirreltail (Sitanion hystrix), needle-and-thread (Stipa comata), desert needlegrass (S. speciosa), and Indian ricegrass (Oryzopsis hymenoides).

The Herd Management Area includes the entire herd area (9,940 acres), that area delineated as the wild horse habitat soon after passage of P.L. 92-195 (map 1).

### C. Land Use Plan Objectives and Constraints

The Lahontan Resource Management Plan (RMP; Nov. 8, 1984) provides the general guidance for the management of the Herd Management Area. The Resource Management Plan states that the Herd Management Area Plan (HMAP) would be the document that guides management of wild horses in Herd Management Areas.

The following decisions from the Resource Management Plan affect the South Stillwater Herd Management Area:

- a. Maintain sound thriving populations of wild horses within Herd Management Areas.
- b. An Herd Management Area Plan will be developed for South Stillwater Herd Management Area.
- c. Initially manage for population of 25 wild horses.

d. Future adjustments in livestock and wild horses will be based on analysis of data from monitoring studies and consultation with interested parties.

e. Develop waters for wild horses.

f. Fences within wild horse herd areas will be located to minimize interference with normal distribution and movement of wild horses. Selected portions of new fences constructed in these areas would be flagged or otherwise marked for 1 year after construction to make them more visible to the wild horses.

g. Maintain or improve the condition of public lands so as to enhance productivity for wildlife. Manage wildlife habitat to achieve a long-term goal of reasonable numbers of big game animals. Protect and maintain existing riparian areas in good or better condition.

h. Improve the condition and productivity of public rangelands to enhance livestock grazing. Limit utilization levels to 55% and improve trend.

i. Provide for proper utilization within key areas (on key species), achieve better livestock distribution to obtain more uniform utilization, and provide for an increase in available forage and water for livestock, wild horses and wildlife.

j. Watershed management plans will be developed through consultation with interested parties and will be coordinated with livestock, wildlife and WH&B management plans. The goals of watershed management plans are to reduce accelerated soil erosion on public lands.

#### D. Other Activity Plans, Issues and Constraints

Existing Activity Plans have stated objectives and constraints which relate to the Herd Management Area, and are summarized below.

##### 1. Multiple Use Decision 1994:

In 1994 a Multiple Use Decision (MUD) was issued for the Mountain Well La Plata grazing allotment, of which the South Stillwater Herd Management Area comprises 7 percent. The entire Herd Management Area is located within the Mountain Well La Plata Allotment. The Multiple Use Decision divided the available forage between wildlife, wild horses and livestock. The Appropriate Management Level (AML) was set at a maximum of 16 wild horses for the South Stillwater Herd Management Area. Wildlife use within the allotments was adjudicated in accordance with the Lahontan Resource Management Plan - 1984.

##### 2. Range Program Summary Update, 1989:

Except for the wild horse objectives the following objectives are for the entire Mountain Well La Plata Allotment.

- a. Initially allow 8,700 Animal Unit Months of forage for livestock allotment wide.

b. Maintain existing ecological condition and trend. Maintain utilization not to exceed 55% on identified key species on upland key areas.

c. Maintain or improve wild horse habitat consistent with wildlife and livestock objectives. Maintain or improve free roaming behavior of wild horses by protecting or enhancing wild horse home ranges. Maintain or improve wild horse habitat by assuring that all waters remain open to use by wild horses. Initially provide approximately 300 Animal Unit Months of forage for approximately 25 head. The entire Herd Management Area is within the Mountain Well La Plata Grazing Allotment.

d. Manage identified mule deer (*Odocoileus hemionus*) habitat to maintain a fair (26-50 rating) or better condition to support 18 deer 5/1 to 10/31 and 20 deer yearlong, 87 Animal Unit Months reasonable numbers. Limit utilization to 55% on identified key species in identified mule deer habitat. Maintain or improve identified bighorn sheep (*Ovis canadensis nelsoni*) habitat at a minimum rating of 73 to help support 100 sheep yearlong, 240 Animal Unit Months reasonable numbers, Stillwater Habitat Management Plan area. Limit utilization to 55% on identified key species in identified bighorn sheep habitat. Manage riparian areas to achieve and maintain late-seral ecological condition. Limit utilization to 55% current year's growth in riparian areas. Maintain or improve willow and aspen stands to have at least 20% of all stems produce young over 5 feet (6 feet for aspen) in height.

3. Stillwater Range Habitat Management Plan, 1987: The objectives below are for the entire Habitat Management Area, which includes all of the Stillwater Mountains in Churchill County.

a. Provide 240 Animal Unit Months of forage for bighorn sheep within the habitat management area.

b. Maintain or improve mule deer habitat. Initially manage habitat for existing number (230 Animal Unit Months) while recognizing reasonable numbers (345 Animal Unit Months) as a long-term goal.

c. Improve 50 acres of riparian habitat to good condition.

d. The Stillwater area has potential to establish peregrine falcons (Falco peregrinus).

e. A wildlife inventory has documented 17 raptor aeries, predominantly golden eagle and prairie falcon, in the Stillwater Range Habitat Management Area.

The objectives of the Habitat Management Plan and this plan do not conflict, as there should be no conflicts between the animals if the total utilization on key grass species is kept at 55% or less.

4. Mountain Well-La Plata Allotment Management Plan, 1970

a. Manage for 8,700 Animal Unit Months of livestock forage.

- b. Provide for 130 to 200 mule deer on a yearlong basis.

## E. Wild Horses

### a. Population

The Strategic Plan recommended the following techniques to manage populations of wild horses:

1. Target specific age groups for removal.
2. Target a specific sex for removal.
3. Utilize fertility control techniques.
4. Develop a policy that allows, with few exceptions, for the removal of only adoptable animals (less than 10 years of age).
5. Nevada and Wyoming will use a selective removal strategy with fertility control that will assure that Appropriate Management Levels are reached within a six-year time frame.

At the present time, the wild horses have virtually unrestricted movement within the Herd Management Area and allotment.

The latest census was conducted in August, 1994, and documented 14 horses within the Herd Management Area.

A summary of the population data is as follows:

#### Census

<u>Date</u>	<u># of Horses</u>
1975	181/
1982	20
1986	16
1989	17
1993	14
1994	14

1/ Fixed Wing Aircraft

All censuses except as indicated were conducted by rotor wing aircraft.

Since the passage of the WH&B Act the population has remained relatively constant. There have not been any removals conducted on this population. Mountain lions (*Felis concolor*) are known to occupy this area, and are suspected to be maintaining this population static by preying upon foals.



b. Habitat Evaluation

There is adequate water for horses within the Herd Management Area.

F. Livestock Use

The Herd Management Area lies entirely within the Mountain Well-La Plata Allotment. Historical grazing preference for the allotment (HMA comprising 7% of the total allotment), has been 8,700 Animal Unit Months.

Livestock grazing occurs within the Herd Management Area during the summer months.

G. Wildlife Use

The Herd Management Area includes habitat for mule deer, bighorn sheep, mountain lion, sage grouse (*Centrocercus urophasianus*), chukar (*Alectoris chukar*), mourning dove (*Zenaidura macroura*), many raptors and other game and nongame species.

There are no known threatened or endangered fauna within the Herd Management Area.

Four U.S. Fish and Wildlife Service Category 2 candidate species, all bats, may occur in this area, long eared myotis (*Myotis evotis*), Yuma myotis (*Myotis yumansis*), Small footed Myotis (*Myotis ciliolabrum*) and spotted bat (*Euderma maculatum*).

H. Soils and Vegetation

The soils in the South Stillwater Herd Management Area exhibit wide ranges of depth, drainage classes, percent surficial and subsurface rock fragments, pH and other diagnostic soil properties. Erosion rates in mountainous areas are generally slight, however some riparian areas are, or have been impacted by severe erosion, including bank and gully erosion.

All utilization studies were conducted using the Key Forage Plant Method. Proper use is 55% or less on perennial grasses (key species) and 45% on shrubs as recommended in the Nevada Rangeland Monitoring Handbook.

There are no known threatened, endangered or candidate plants within the Herd Management Area.

I. Recreation

Traditional forms of recreation such as sight-seeing, camping, hunting, hiking, photography and nature study occur within the South Stillwater Herd Management Area.

Access to the Herd Management Area is limited to several rough dirt roads.

#### J. Range Improvements

There are several short pipelines and water troughs constructed for livestock and wildlife watering and portions of 2 fences within the Herd Management Area.

#### K. Water and Riparian

Five small springs/seeps less than one quarter acre each occur within the Herd Management Area. An inventory of these springs was conducted in 1980-81. At that time the springs/seeps were in varying stages of moderate to severe impacts by livestock and wild horses. There is no definitive information on the present state of functionality of these riparian areas.

#### L. Other Activities

There are no other activities known to impact the wild horses within the Herd Management Area.

#### M. Wilderness

Virtually the entire Herd Management Area is within the Job Peak Wilderness Study Area.

#### N. Cultural Resources

No cultural resource inventory has been performed within the South Stillwater Herd Management Area, therefore cultural resource values are unknown.

#### O. Issue and Problem Summary

Currently the impacts of wild horses are not a problem except for the riparian areas. The wild horse population is being maintained at a level where it is not adversely impacting other resources and appears stable. Riparian areas may require fencing to prevent combined overuse from livestock and horses.

*How would you know?*

The Mountain Well-La Plata Allotment Evaluation of 1994 made the following recommendations:

Achieve and maintain proper functioning condition on 75 percent of all riparian areas within the allotment by 1997.

Remove wild horses that are outside the herd management area.

## II. Objectives and Management Methods

### A. Animal Objectives

#### Objective 1

Maintain the wild horses in good or excellent physical condition.

#### Management Method

Provide an adequate amount of forage for the individual horses in the population by maintaining the population of wild horses at a level in balance with the forage productivity of the habitat, and other large herbivore use within the Herd Management Area (Habitat Objective 1 and requirements of wildlife and livestock). Based on the analysis of monitoring data under Habitat Objective 1, providing a proper amount of forage per animal will allow the animals to maintain themselves in a healthy condition, better able to withstand environmental fluctuations (weather/climate).

Prior to future removals current utilization data will be analyzed to determine if the Appropriate Management Level set in the multiple use decision is still appropriate. Future gathers may be postponed if current data indicates that the Herd Management Area can support an increased horse population. Also, future gathers may decrease the horse population below the minimum Appropriate Management Level if current monitoring data indicates that the Appropriate Management Level is too high for current range conditions.

#### Objective 2

Maintain the free-roaming nature of the wild horses.

#### Management Method

All projects proposed on BLM administered land within the Herd Management Area will be carefully evaluated through an environmental assessment process as to their effect on free-roaming behavior and movement of wild horses.

#### Objective 3

Maintain the wild horses within the Herd Management Area.

#### Management Method

During periodic population reductions (if needed), horses gathered outside of the Herd Management Area will not be released back into the Herd Management Area (to the extent possible) because they will likely return to the area from which they were removed (Waring 1979, Tyler 1972 and observations of released horses within the Lahontan Resource Area). Any wild horses located outside of the Herd Management Area will receive priority for removal.

#### Objective 4

Minimize the adverse effects of gathers to both the individual wild horses and the population.

#### Management Method

Using a variation (managing horses within a range, i.e. 12 - 16) below the maximum herd size indicated from analysis of monitoring data (Multiple Use Decisions 1994) will increase the time interval between captures, thereby reducing stress, injuries and deaths associated with capture operations. Furthermore, it is not physically or fiscally possible to capture horses in the same Herd Management Area every year. If horses were allowed to increase above the Appropriate Management Level then resource damage would occur.

#### Objective 5

Remove only adoptable animals (Strategic Plan).

#### Management Method

National policy prevents placement into the adoption program of animals older than 9 years, because it is not cost effective to place older animals. Therefore, only animals 9 years or younger will be removed from the Herd Management Area for placement into the adoption program.

During removals only adoptable animals (<10 years of age) will be removed for adoption. Older animals and animals with large scars or other features substantially decreasing their adoption potential will be released back into a Herd Management Area. Horses with severe permanent disabilities (i.e. broken legs, severely clubbed feet, etc.) may be euthanized.

#### Objective 6

Maintain genetic diversity

#### Management Method

Some unadoptable (i.e. older) horses from other herd areas may be released into the Herd Management Area which will allow for gene flow between other Herd Management Areas within this Resource Area.

*NEED TO BE NOTIFIED AND  
IN EA AND completed*

### B. Habitat Objectives

#### Objective 1.

Allow no more than 55% utilization on key plant grass species (Indian ricegrass, Idaho fescue, needle grass) and 40% on interim grass species (bottlebrush squirreltail and bluegrass) yearlong on previous year's growth by March. Also, to insure that plants are not harmed during the critical part of the growing season, use should be limited to the slight use category before seed ripe.

### Management Method

Limit the maximum number of wild horses to 16.

### Objective 2

Increase the quantity and quality of water and improve the riparian areas.

### Management Method

Construct exclosures around the 5 springs and associated riparian areas within the Herd Management Area. Water would be allowed to flow under the exclosures or piped to nearby troughs

## III. Management Evaluation and Revision

### A. Animal Studies

The studies described below are designed to monitor the attainment of the specific management objectives developed for this Herd Management Area.

#### 1. Actual Use

**Need:** It is necessary to continue collecting data on the number and kinds (wild horses, wildlife and livestock) of animals which are utilizing the forage within the Herd Management Area in order to make quantifiable decisions with regard to wild horse, cattle and wildlife numbers by season of use.

**Method:** Helicopter censusing will be the method used to estimate the wild horse population in conjunction with on the ground identification of individual animals. Censuses will be conducted during the summer or fall to include and identify young. These censuses will occur at intervals of 3 years or less. Actual use by wild horses will be derived from population estimates.

#### 2. Demography

**Need:** Data are needed on the foaling rate of mares and the survival rate of foals and adults in order to determine the rate of increase.

**Method:** Capture data, ground and aerial observations will provide base line data. This will aid in determining the efficacy of different management strategies. Data will be analyzed using base-line parameters specific to this Herd Management Area, where applicable.

## B. Habitat Studies

### 1. Utilization

Implementation of Habitat Objective 1 will require the maintenance of utilization at 55% or less on key grass species (Indian ricegrass, needlegrass and Idaho fescue; level recommended in the Nevada Rangeland Monitoring Handbook), and to 40% on bottlebrush squirreltail and blue grass.

Need: To determine the amount of use (degree of utilization) made of available forage by wild horses, livestock and wildlife.

Method: Utilization studies will be conducted prior to cattle turnout in dual use portions of the Herd Management Area. In addition to this, utilization data will be collected on the entire Herd Management Area at the end of each livestock grazing season. All utilization studies will be done using the Key Forage Plant Method. Each point where a utilization transect is run will be considered a study area and the location will be shown on the appropriate topographic map. (Outlined in BLM Handbook TR4/ 400-3 p. 11). Use pattern maps will then be constructed from these studies, showing relative areas and intensity of utilization.

### 2. Trend

Need: Trend refers to the direction of change of ecological or forage condition. It indicates whether the rangeland is moving toward or away from its ecologic potential or specific management objectives.

Method: Read Frequency transects at key areas every 5 years.

### 3. Ecological Status

Need: Ecological status is determined by the present state of the vegetation and soil production of an ecological site in relation to the potential natural community for that site. Ecological range condition will be measured for each key area following MH 4400-1 guidelines (Soil Conservation Service National Range Handbook) to assure progress towards the desired seral stages.

Method: Key area condition transect will be done. Key area condition transects will be re-evaluated upon measurement of a statistically significant change in frequency data. These results will be evaluated to determine change in frequency data (trend). Furthermore, results will also be evaluated to determine if the objectives have been realized. (Refer to Nevada Rangeland Monitoring Handbook p. 13).

## C. Evaluation

All adjustments in livestock and wild horse use in the South Stillwater Herd Management Area will be based on rangeland monitoring. Monitoring information will be collected and evaluated on a yearly basis in accordance with the Nevada Rangeland and Monitoring Task Force Recommendations.

Utilization results and use pattern maps will be analyzed to determine if Habitat Objective 1 is being achieved. Actual use will be used in conjunction with utilization data in revision of the numbers in the plan. Horse and cattle numbers may be adjusted either  $\pm$  as utilization results indicate. Cattle adjustments will be based upon monitoring as described in the Mountain Well La Plata Allotment Management Plan. Future Multiple Use Decisions may amend the numbers specified in this plan.

Adjustments in wild horse numbers will be based on the results of utilization studies (III. B. 1.) with the objective of limiting total vegetation use within the Herd Management Area to 55 percent or less on key species and 40 percent on interim species.

The formula for calculating proper use

$$\frac{\text{Actual use (AUMs)}}{\text{Average/Weighted Average Utilization}} = \frac{\text{Potential Actual Use (AUMs)}}{\text{Desired Average Utilization}}$$

When total utilization increases above 55 percent on key species and 40 percent on interim species, a gather will be conducted to bring the wild horse population to a level consistent with management objectives (see also II., A., objective 4.).

Horses that have established home ranges outside of the Herd Management Area will be removed as soon as is practical.

Helicopter censuses will be key to identifying the need for removals in accordance with Animal Objective 1.

The entire plan will be evaluated in 2000 to determine if objectives are being attained.

#### Modification

This plan may be modified if data from studies and experience indicate that changes are desirable. Also, animal numbers and ranges may be modified through Multiple Use Decisions which will result from ongoing monitoring.

#### IV. Funding

All actions undertaken pursuant to this plan are contingent upon available funding and manpower.

V. ENVIRONMENTAL ASSESSMENT EA No. NV-030-95-013, SOUTH STILLWATER  
HERD MANAGEMENT AREA PLAN

A. INTRODUCTION AND PURPOSE

The purpose of this Herd Management Area Plan (HMAP) is to maintain both a healthy wild horse population and the range in a healthy condition (thriving natural ecological balance) and multiple use relationship preventing deterioration of the vegetation community in the South Stillwater Herd Management Area (HMA). This proposal is in conformance with the Lahontan Resource Management Plan (RMP).

Relationship to Other Environmental Documents

This Environmental Assessment is tiered to the Lahontan Resource Management Plan Environmental Impact Statement (EIS) which analyzed the general ecological impacts of managing rangelands in the Lahontan area under a program including the monitoring and adjustment of wild horses and livestock. This Environmental Assessment is a project specific refinement of the Resource Management Plan/Environmental Impact Statement, focused on the management of wild horses in the South Stillwater Herd Management Area. The decisions regarding overall rangeland management analyzed in the Lahontan Resource Management Plan/Environmental Impact Statement would not be changed by the South Stillwater Herd Management Area Plan. These documents are available for public review at the Carson City District Office.

B. DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

1. Proposed Action

The proposed action is to maintain a thriving natural ecological balance between the vegetative community, wild horses, wildlife and livestock and maintain the wild horse population in a healthy state. The specific objectives and management methods are described in the Objectives and Management methods section of the Herd Management Area Plan. They include:

Objective: Maintain an interval between removals of at least 3 to 4 years. *When was last?*

Management Action: Maintain wild horses within a population range of 12 - 16.

Management Action: Utilize a helicopter to herd horses into corrals constructed out of portable steel panels. Other motorized equipment would also be used.

Management Action: Nursing mares or foals which have become separated from nursing mares may need to be roped. However, based on past removals it is anticipated that less than 1 percent of the animals would require roping.

Management Action: The Bureau of Land Management may contract with a private party for the removal operation. If a contractor is used he/she would be supervised at all times by Bureau employee(s).



Objective: Placing only adoptable horses into the adoption program.

Management Action: Only animals less than 10 years of age would be placed into the adoption program, other excess unadoptable horses would either be released into another Herd Management Area or back into the South Stillwater Herd Management Area.

Objective: Maintain horses within the Herd Management Area.

Management Action: Place horses removed from areas outside of the Herd Management Area into the adoption program, other Herd Management Areas within the Resource Area, or release them back into the South Stillwater Herd Management Area.

Objective: Improve the condition of the 5 riparian areas within the Herd Management Area.

Management Action: Construct protective exclosures around the springs and associated riparian areas.

## 2. No Action Alternative

The no action alternative would not include any of the objectives and management actions.

## 3. Alternatives considered but not analyzed

Herding from horse back and water trapping were considered, however, they are not feasible for this Herd Management Area. Because of the many springs outside of this Herd Management Area water trapping would not be feasible. Wild horses cannot be effectively controlled with riders on saddle horses. Capturing wild horses from horse back would likely result in injuries to saddle horses and riders. Also, the wild horses would likely be herded further than if helicopters were used and horses within individual bands would likely be separated, including foals.

## C. AFFECTED ENVIRONMENT

The affected environment of the South Stillwater Herd Management Area is described in sections E - K in the Herd Management Area Plan.

## D. ENVIRONMENTAL IMPACTS

### 1. Proposed Action

#### Impacts on Vegetation

Managing horse numbers between 12 and 16, a level which can be maintained by the vegetation ( $\leq 55\%$  total use) and is compatible with wildlife and livestock grazing, would result in the vegetative community being maintained or improved. During years of lower population levels the vegetation would receive benefits associated with less grazing

pressure, and disturbance associated with removal operations would be minimized. During years of lower horse numbers the forage plants would receive less grazing pressure allowing for more storage of energy and an increase in the quantity and quality of seeds.

*4 horses are measurable*

Numerous studies have documented the adverse effects of over and early season grazing to grass plants. Leithead (1963) showed that during the spring, grazing is detrimental because the grasses are using their stored reserves which are at their lowest level. Plants rely on these reserves to begin growth. Branson (1956), Harris (1967) and Evans & Tisdale (1972) all found that removing the apical meristems greatly retards any further growth, which prevents the plants from producing more foliage, thus, preventing the plant from storing any energy and replacing stored energy used to form the early foliage growth. McLean and Wilkeem (1985) found that defoliation beyond the end of the growing period allows no opportunity for production of new foliage and subsequent accumulation of nutrient reserves before summer dormancy. Wilson et al. (1966) found that heavy spring grazing results in decreasing plant vigor, seed stalk production and eventually results in plant mortality. Wilson et al. (1966) also found that grazing bluebunch wheatgrass to 1" stubble height during boot state for 3 consecutive years would result in mortality.

#### Impacts on Horses

From analysis of monitoring data it was determined that 16 wild horses are the maximum that the Herd Management Area can support (Appendix 1) while maintaining a thriving natural ecological balance between vegetation, wild horses, wildlife and livestock. In order to minimize the stresses and disruption of band structures the population of wild horses would be reduced below 16 and allowed to increase back to 16.

Managing horses between 12 and 16, a level which can be maintained by the vegetative community with other uses would minimize the stresses to the individual horses associated with limited food and space resources. Minimizing the day to day stresses would be especially important to the young animals. Managing the population which maximizes the intervals between removals minimizes the stresses associated with removals. Managing horses in harmony with their habitat and maximizing intervals between removals would result in only positive benefits (i.e. reduced stresses to the animals and a healthy vegetative community).

Managing the wild horses within a range (i.e. 12 - 16) would require that the population be reduced below the maximum allowable population level. A healthy viable population would be maintained.

Reducing horses below the maximum number (AML) that the habitat can support in concert with the other uses (i.e. wildlife, livestock grazing) would reduce the stress of gathers by allowing an interval of approximately 3 to 4 years between gathers (Appendix 4).

During periodic removals, animals captured from areas outside of the Herd Management Area would either be placed into the adoption program, released into other Herd Management Areas or released back into the Herd Management Area as far from the

point of capture as possible. Horses are likely to return to their home ranges after release (Tyler 1972, Waring 1979 and post release census flights). Therefore, releasing animals back into the Herd Management Area would only be done when the other alternatives are not practical.

Targeting young animals would result in removing only readily adoptable young animals. Leaving the older horses (10 years and older) in the population would preserve the genotypes that have proved most adapted to this Herd Management Area.

Unavoidable impacts in the form of injuries to the horses may occur during the removal process. Death loss is not expected to exceed 1% of the horses captured at the trap site, based on past gathers. Potential injuries and fatalities can be limited through strict enforcement of contract specifications (Appendix 3) for safety and humane treatment of animals. BLM representatives would be monitoring the contractor's activities at all times during removal to ensure compliance with specifications and humane treatment of animals.

Some stress to the horses would be associated with the helicopter herding operations. However, after adoption the horses become accustomed to captivity.

#### Impacts on Wildlife

Managing horses within a range of 12 to 16 (total vegetative utilization  $\leq 55\%$ ) would have positive impacts on wildlife by insuring adequate forage and space for wildlife species. This horse level would help in providing habitat requirements for wildlife, thus aiding in the maintenance of biodiversity.

#### Other Impacts

By managing horses at the identified levels, forage would be available for grazing by livestock which would help meet Resource Management Plan objectives and would allow a thriving natural ecological balance to be maintained between the vegetative community, wildlife, wild horses and livestock. This would result in positive impacts. The vegetative community, wild horse populations and wildlife populations would be stabilized.

The proposed action would not adversely impact air quality, areas of critical environmental concern, recreation, cultural resources, farmlands, floodplains, Native American religious concerns, threatened and endangered species, wastes, water quality, wetlands and riparian zones, wild and scenic rivers or wildernesses.

No impacts would occur to cultural resources, as proposed trap sites and holding facilities would be inventoried prior to construction in order to avoid those areas where cultural resources exist.

Construction of temporary trap sites will occur outside of the Wilderness Study Area, thereby avoiding impacts to the Wilderness Study Area. Protective exclosures constructed around springs and associated riparian areas will be addressed in a site specific Environmental Assessment prior to the construction of any exclosures.

### No Action

At the present time the horse numbers are static, and an immediate removal is not necessary, however, if mountain lions are controlling this population the situation could change quickly. If the situation should change, the wild horses would not be maintained at a level compatible with their environment, and they would continue to increase. As the wild horse numbers increase the degradation of vegetation would occur. Eventually most of the desirable plants would be lost from the Herd Management Area and surrounding area. This action would directly affect wildlife and livestock by removing habitat and forage. A decrease in biodiversity would occur.

The vegetation (quantity, quality and species evenness) would eventually decrease to a point which could no longer support the horse population, at this point a large proportion of the horse population would die along with wildlife. However, prior to the population crash the habitat would have deteriorated, and undesirable exotic invader species such as halogeton (*Halogeton glomeratus*), cheatgrass (*Bromus tectorum*) and Russian thistle (*Salsola kali*) would have established themselves over large areas. Invader species have already established themselves in several Herd Management Areas within this Resource Area. Thus, the Herd Management Areas capacity to support horses would be only a small percent of its potential capacity and it would take many decades of low or no grazing pressure to recover to its potential carrying capacity. The no action alternative would also preclude attainment of wildlife, soil, water and livestock objectives in the Resource Management Plan .

### E. Coordination and Consultation

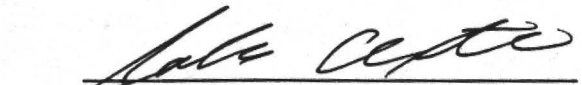
This draft Herd Management Area Plan / Capture Plan, FONSI and Environmental Assessment has been sent to the following persons, groups and government agencies in order to solicit comments.

American Bashkir Curley Register  
American Horse Protection Assn.  
American Mustang and Burro Assn.  
Animal Protection Institute of America  
Anna Charlton  
Ann Earle  
Barbara Eustis-Cross Executive Director L.I.F. E. Foundation  
Bobbi Royle  
Carson City District Grazing Advisory Board  
Commission for the Preservation of Wild Horses  
Craig C. Downer  
Dan Keiserman  
Edie Wilson  
Fund for Animals  
Kathy McCovey  
International Society for the Protection of Mustangs and Burros  
Ira H. Kent  
Michael Kirk

NRDC  
National Mustang Association  
Nevada Cattlemen's Association  
Nevada Department of Wildlife  
Nevada Federation of Animal Protection Organization  
Nevada Humane Society  
Nevada Land Action Association  
Nevada State Clearinghouse  
Nevada State Division of Agriculture  
Paul Clifford  
Paula Askew  
Rebecca Kunow  
Resource Concepts Inc.  
Steven Fulstone  
The Honorable Barbara Vucanovich  
The Honorable Harry M. Reid  
The Honorable Richard Bryan  
The Mule Deer Foundation  
The Nature Conservancy  
U.S. Fish and Wildlife Service  
U.S. Humane Society  
Venessa Kelling  
Wild Horse Organized Assistance

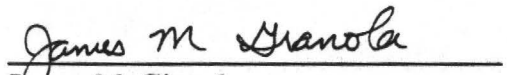
VI. List of Preparers

Prepared by:

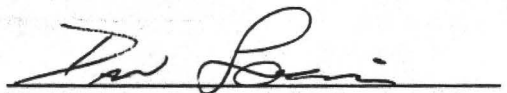
  
\_\_\_\_\_  
John Axtell  
Wild Horse and Burro Specialist  
Lahontan Resource Area

10 Jan 95  
Date


Reviewed by:

  
\_\_\_\_\_  
James M. Gianola  
District Wild Horse and Burro Specialist  
Carson City District

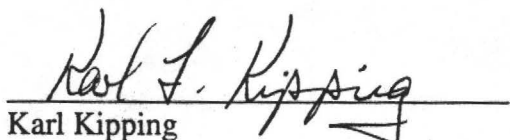
1-18-95  
Date

  
\_\_\_\_\_  
David Loomis  
Environmental Planner  
Carson City District

1-18-95  
Date

  
\_\_\_\_\_  
Dan Jacquet  
Assistant District Manager  
Carson City District

1/20/95  
Date

  
\_\_\_\_\_  
Karl Kipping  
Associate District Manager  
Carson City District

1/20/95  
Date

## VII. FINDING OF NO SIGNIFICANT IMPACT AND DECISION RECORD (DRAFT)

Decision: Implement the South Stillwater Herd Management Area Plan and Capture Plan. The subject plan directs management actions for the South Stillwater Herd Management Area. The major actions in the subject plan include limiting vegetation utilization to 55%, providing habitat for wild horses and wildlife, outlining studies to assure that Land Use Plan objectives are being met and removing excess wild horses if necessary. The selected alternative is the proposed action which contains the above mentioned features.

Finding of No Significant Impacts: Based on the analysis of potential environmental impacts contained in the environmental assessment, impacts are not expected to be significant and an environmental impact statement is not required.

The Lahontan Resource Management Plan stated that Herd Management Area Plans would guide the management of wild horses, through the determination of proper horse use levels. By maintaining the population of wild horses between 12 and 16, the vegetation utilization levels will be maintained at sustainable levels ( $\leq 55\%$  use). This action is not significant because a population of wild horses will be maintained within the Herd Management Area and the vegetation, wildlife and livestock will not be adversely impacted.

3To avoid adverse impacts to foals, foals will be weaned from their mares prior to the release of older excess mares into other Herd Management Areas. This action is not significant because impacts are avoided.

Unavoidable impacts in the form of injuries to the horses may occur during the removal process. Death loss is not expected to exceed 1% of the horses captured at the trap site. Some stress to the horses would be associated with the capture operations, however, after adoption the horses become accustomed to captivity. Because the loss of animals due to accidents is low the impacts involved in the capture operation are not significant.

Rational for decision: The decision to implement the South Stillwater Herd Management Area Plan and Capture Plan is in conformance with the Lahontan Resource Management Plan , approved in 1985, and will maintain the range in a thriving natural ecological balance and prevent a deterioration of the range, as analyzed in the subject Environmental Assessment , in accordance with Sec. 3(b) of the Wild Free-Roaming Horses and Burros Act, as amended, 16 U.S.C. 1333(b) (1989). This will result in reduced soil erosion and improve the physical condition of wild horses.

The proposed actions will not adversely impact air quality, areas of critical environmental concern, cultural resources, farmlands, floodplains, Native American religious concerns, threatened and endangered species, wastes, water quality, wetlands and riparian zones, wild and scenic rivers or wildernesses.

Recommended for Approval by:

\_\_\_\_\_  
James M. Phillips  
Area Manager  
Lahontan Resource Area

\_\_\_\_\_  
Date

Approved by:

\_\_\_\_\_  
John O. Singlaub  
District Manager  
Carson City District

\_\_\_\_\_  
Date

DRAFT



## VIII. Literature Cited

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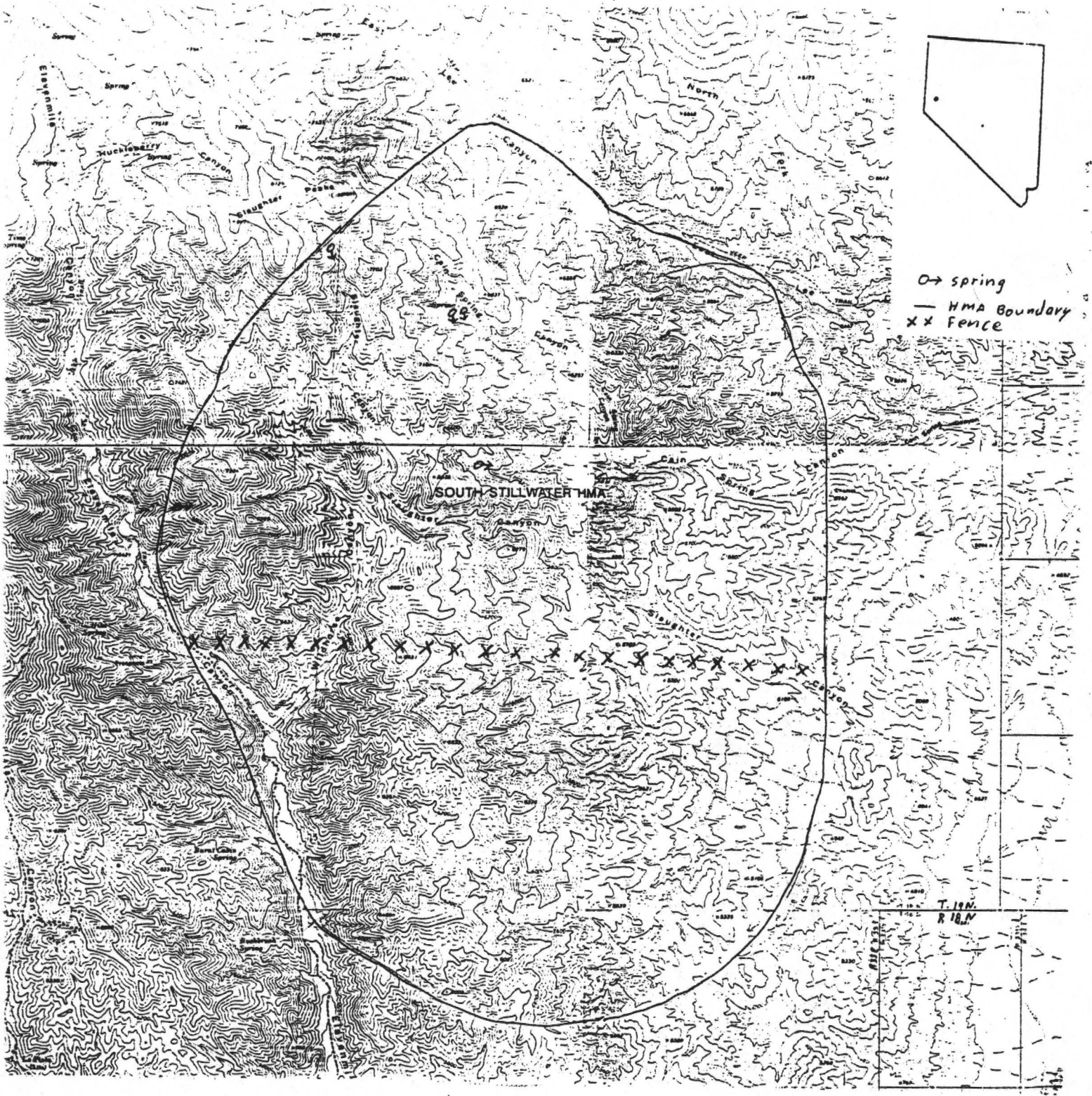
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## Appendix 1 Animal Numbers

In 1994 a Multiple Use Decision (MUD) was issued for the Mountain Well La Plata grazing allotment which includes the South Stillwater Herd Management Area. This decision was based on monitoring data involving wild horses and livestock within the Herd Management Area. A draft Multiple Use Decision was sent out to the persons, groups and agencies requesting participation in the review and comment process, this decision were not protested and became final in 1994.

The latest complete census of this area was conducted in August of 1994 and documented 16 horses in the Herd Management Area.

As previously stated, an Appropriate Management Level of a maximum of 16 was set for the Herd Management Area with a management range of 12 - 16 wild horses for the Herd Management Area.

NOT!

Chemical or mechanical contraceptives may also be used to retard the rate of increase, thereby permitting gathers to be deferred for greater time intervals. Removing horses from various age groups will also be employed. It is not anticipated that removing animals older than 9 years of age will occur. The precise technique used at each removal will vary depending on the cost and efficacy of contraceptives versus the current adoption demand.

## Appendix 2 Utilization Levels and Monitoring Schedule

The Multiple Use Decisions issued set both livestock and horse numbers. However, future monitoring may indicate that adjustments in grazing use is required to meet Resource Management Plan objectives. If overutilization occurs in dual use areas reductions in both livestock and horses will be required. A Multiple Use Decision would then be issued to reflect current monitoring information.

Monitoring will be done on or around 20 July, and 20 October. Use on previous years growth needs to be limited to 55% by the beginning of the growing season (March).

## Appendix 3 Removal Procedures

### I. Methods for Removal and Safety

The methods employed during this capture operation will be either herding horses with a helicopter to a trap built with portable panels or capturing the horses using portable panels around water troughs. The Bureau of Land Management may contract with a private party for part or all of this operation. If a private party is used for this operation Bureau employee(s) will be supervising the contractor at all times during the gathering operation. The following stipulations and procedures will be followed during the contract to ensure the welfare, safety and humane treatment of wild horses and that wild horses are removed from proper areas. If capture operations are performed by Bureau personnel, the Bureau will follow the same stipulations that we require of a private contractor.

#### A. Roundup Procedures within Contract Area:

The Contracting Officer's Representative (COR) or Project Inspectors (PI) will determine specific roundup areas and numbers of animals within general contract areas as animal concentration, terrain, physical barriers and weather conditions dictate. Upon determination of the specific roundup areas, the COR/PI will select the general location of trap sites in which to herd the animals. Animal concentration, terrain, physical barriers and weather conditions will all be considered when selecting trap sites.

#### B. Motorized Equipment

1. All motorized equipment employed in the transportation of captured animals shall be in compliance with appropriate State and Federal laws and regulations applicable to the humane transportation of animals.
2. Vehicles shall be in good repair, of adequate rated capacity, and operated so as to insure that captured animals are transported without undue risk of injury.
3. Only stock trailers shall be allowed for transporting animals from traps to temporary holding facilities. Only Bobtail trucks, stock trailers, or single deck trucks shall be used to transport animals from temporary holding facilities to final destination. Sides of stock racks of transporting vehicles shall be a minimum height of 6 feet 6 inches from vehicle floor. Single deck trucks with trailers 40 feet or longer shall have 2 partition gates to separate animals. Trailers less than 40 feet shall have at least 1 partition gate to separate the animals. Each partition shall be a minimum of 6 feet high and shall have a minimum 5 foot wide swinging gate. The use of double deck trailers is unacceptable and shall not be allowed.
4. All vehicles used to transport animals to final destination shall be equipped with at least 1 door at the rear end of the vehicle which is capable of sliding either horizontally or vertically.
5. Floors of vehicles and loading chute shall be covered and maintained with a non-skid surface such as sand, mineral soil or wood shavings, to prevent the animals from slipping. This will be confirmed by a BLM employee prior to loading (every load).

6. Animals to be loaded and transported in any vehicle shall be as directed by the COR/PI and may include limitations on numbers according to age, size, sex, temperament and animal condition. A minimum of 1.4 linear foot per adult animal and .75 linear foot per foal shall be allowed per standard 8 foot wide stock trailer/truck.

The BLM employee supervising the loading of the wild horses to be transported from the trap to the temporary holding corral will require separation of small foals and weak horses from the rest, if they could be injured during the trip. Distance and condition of the road and animals will be considered in making this determination. Horses shipped from the temporary holding corral to the BLM facility will normally be separated by studs, mares and foals (including small yearlings). However, if the numbers of these classes of animals are too few in one compartment and too many in another, animals may be shifted between compartments to properly distribute the animals in the trailer. This may include placing a younger, lighter stud with the mares or a weak mare with the foals. Further separation may be required should condition of the animals warrant.

The BLM employee supervising the loading will exercise authority to off-load animals should there be too many horses on the trailer or truck.

7. The COR/PI shall consider the condition of the animals, weather conditions, type of vehicles, distance to be transported, and other factors when planning for the movement of captured animals. The COR/PI shall provide for any brand inspection or other inspection services required for the captured animals.

It is currently planned to ship all horses to the Palomino Valley facility. Communication lines have been established with the Palomino Valley personnel involved in off-loading the horses, to receive feedback on the condition of shipped horses. Should problems arise, shipping methods or separation of the horses will be changed in an attempt to alleviate the problems.

8. If the COR/PI determines that dust conditions are such that the animals could be endangered during transportation, the contractor will be instructed to adjust speed. The maximum distance over which animals may have to be transported on dirt road is approximately 5 miles.

Periodic checks by BLM employees will be made as the horses are transported along dirt roads. If speed restrictions are placed in effect, then BLM employees will, at times, follow or time trips to ensure compliance.

### C. Trapping and Care

1. The helicopter shall be used in such a manner that bands of horses will remain together. Foals shall not be left behind.

The Carson City District may use an observation helicopter to supervise the use of the project helicopter. In the absence of an observation helicopter a saddle horses may be used to place a BLM observer on a point overlooking the area of the helicopter herding operations. Mares will be checked soon after capture to determine if they are nursing. If

nursing mares are captured without foals intensive monitoring will be conducted to identify the reason(s) foals are being abandoned and a solution will be developed. The health and well being of the captured animals are paramount and foals will not be left behind.

2. The rate of movement and distance the animals travel shall not exceed limitations set by the COR/PI who will consider terrain, physical barriers, weather, condition of the animals and other factors.

BLM will not allow horses to be herded more than 10 miles. The COR/PI may decrease the distance moved should the route to the trap site be steep or rocky enough to pose a danger or cause avoidable stress. Animal condition will also be considered in making distance and speed restrictions.

Special attention will be given to avoiding physical hazards such as fences. Map 1 shows locations of fences and any other potential hazards.

3. It is estimated that 1 trap location will be required to accomplish the work. All trap locations and holding facilities must be approved by the COR/PI prior to construction. Proposed trap sites and holding facilities will be inventoried prior to construction in order to avoid those areas where cultural resources exist. The contractor may also be required to change or move trap locations as determined by the COR/PI. All traps and holding facilities not located on public land must have prior written approval of the landowner.

If the tentative trap site (Map 1) is not located near enough to the concentrations of horses, then the trap site will not be approved. The COR/PI will move the general location of the trap closer to the horses. Trap sites will be located outside of the WSA. Trap sites will not be approved where barbed-wire fences are used as wings, wing extensions, or to turn the horses, during herding, toward the trap.

4. All traps, wings and holding facilities shall be constructed, maintained and operated to handle the animals in a safe and humane manner and be in accordance with the following:

a. Traps and holding facilities shall be constructed of portable panels, the top of which shall not be less than 72 inches high, the bottom rail of which shall not be more than 12 inches from the ground level. All traps and holding facilities shall be oval or round in design.

b. The loading chute shall also be a minimum of 6 feet high.

c. All runways shall be a minimum of 20 feet long and a minimum of 6 feet high.

d. Wings shall not be constructed out of barbed-wire or other materials injurious to animals and must be approved by the COR/PI.

e. All crowding pens including the gates leading to the runways shall be covered with material which prevents the animals from seeing out (plywood, burlap, etc.) and shall be covered a minimum of 1 foot to 5 feet above ground level. Eight linear feet of this material shall be capable of being removed or let down to provide a viewing window.



5. No fence modification will be made without authorization from the COR/PI. The contractor shall be responsible for restoration of any fence modification which he has made.

If the route the contractor wishes to herd horses passes through a fence, the contractor will be required to roll up the fencing material and pull up the posts to provide at least one-eighth mile gap. The standing fence on each side of the gap will be well flagged for a distance of 300 yards from the gap on each side.

6. When dust conditions occur within or adjacent to the trap or holding facility, the contractor shall be required to wet down the ground with water.

7. Alternate pens, within the holding facility shall be furnished by the contractor to separate mares with small foals, sick and injured animals, and stray animals from the other horses. Animals shall be sorted as to age, number, size, temperament, sex, and condition when in the holding facility so as to minimize injury due to fighting and trampling.

As a minimum, studs will be separated from the mares and foals when the animals are held overnight.

8. Animals shall be transported to final destination from temporary holding facilities within 24 hours after capture unless prior approval is granted by the COR/PI for unusual circumstances. Animals shall not be held in traps or temporary holding facilities on days when there is no work being conducted except as specified by the COR/PI. The contractor shall schedule shipments of animals to arrive at final destination between 6:00 am. and 4:00 PM.

9. The contractor shall provide animals held for 5 hours or more in the traps or holding facilities with a continuous supply of fresh clean water at a minimum of 10 gallons per animal per day. Animals held for 10 hours or more in the traps or holding facilities shall be provided good quality hay at the rate of not less than 2 pounds of hay per 100 pounds of estimated body weight per day.

10. It is the responsibility of the contractor to provide security to prevent loss, injury or death of captured animals until delivery to final destination.

11. The contractor shall restrain sick or injured animals if treatment by the government is necessary. The COR/PI will determine if injured animals must be destroyed and provide for destruction of such animals. The contractor may be required to dispose of the carcasses as directed by the COR/PI.

12. Mares and foals will be paired up soon after capture and separated from other adult horses. Mares that are within the target age group for removal will be shipped to PVC with their foal. Foals of older mares (mares older than the ones selected for removal) that are old enough to wean, will be weaned and shipped to PVC. While holding animals at temporary corrals every effort will be made to pair up mares with foals. Any foals that do not pair up with an mare will be shipped to PVC.

13. Foals of older mares which are too young to wean will be released back into the Herd Management Area with their mare. In order to minimize stress to the foals, older mares and their foals will be released separately from other mares and stallions. Depending upon the situation they may be released prior to the other animals or after the other animals have been released. Also, we may transport the mares with very young foals in a stock trailer to areas close to their core areas when feasible. The objective will be to maximize the period of time between releasing small foals and other animals. Also, mares with foals will be released in small groups to minimize the likelihood of the adult horses running off to quickly for the foals to keep up.

14. Following the release of animals from corrals or trailers, the area surrounding the release site will be monitored to determine the success of the release prior to the contractor moving to another area or the termination of the task order.

## II. Disposition of Removed Animals

The wild horses and burros will be sent to Palomino Valley Wild Horse and Burro Placement Center to be processed for adoption.

Impounded, privately owned animals will be processed as outlined in the Bureau of Land Management, Nevada State Office Instruction Memoranda NV-84-116 and NV-85-416.

## III. Responsibility

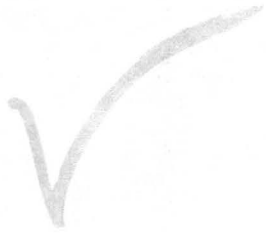
The District Manager is responsible for maintaining and protecting the health and welfare of the wild horses. To ensure the contractor's compliance with the contract stipulations, the COR and PIs all from the Carson City District, will be on site. Also, the Lahontan Area Manager and the Carson City District Manager are very involved with guidance and input into this removal plan and with contract monitoring. The health and welfare of the animals is the overriding concern of the District Manager, Area Manager, COR and PIs.

The COR and/or PI will constantly, through observation, evaluate the contractor's ability to perform the required work in accordance with the contract stipulations. Compliance with the contract stipulations will be through issuance of written instructions to the contractor, stop work orders and default procedures should the contractor not perform work according to the stipulations.

Prior to issuance of the "Notice to Proceed" to the contractor, the COR and PIs will inspect the equipment to be used during the contract, to insure the equipment meets or exceeds the standards contained in the contract stipulations. Prior (less than 20 days) to the start of the contract and constantly during the course of the contract the COR and/or PIs will evaluate the conditions which may cause undue stress to the animals. The factors considered will include animal condition, prevailing temperatures, drought conditions, soil conditions, topography, animal distribution, distance animals travel to water, quantity of available water and condition of roads that animals are to be transported over. These factors will be evaluated to determine if additional constraints other than those already discussed above, need be initiated in order to safely capture and transport the animals (i.e. veterinarian

present, or delay of capture operations). This is of special concern during this year of drought which may intensify the impact of removal operations on the animals and the roads.

2/1995



Mr. James Phillips  
Lahontan Resource Manager  
Bureau of Land Management  
1535 Hot Springs Road, Suite 300  
Carson City, Nevada 89706-0638

SUBJECT: Draft HMAP/Capture Plan and EA for South Stillwater HMA

Dear Mr. Phillips:

Thank you for consulting the Nevada Commission for the Preservation of Wild Horses concerning the South Stillwater Herd Management Area Plan and Environmental Assessment. The concerns for this herd is to protect wild horse habitat and assure that a viable population is preserved.

SOUTH STILLWATER HERD MANAGEMENT PLAN

The land use plan objectives for this herd were best established in the Mountain Well La Plata Multiple Use Decision in 1994. This document was to determine the appropriate management level for the herd to achieve an natural ecological balance with the other uses of this allotment. Unfortunately, the allotment evaluation suggested that riparian areas were being degraded by wild horses and livestock. The multiple use decision did not provide any relief to this situation.

It appears the "Strategic Plan" sets policy, objectives and management techniques for the South Stillwater Herd without proper environmental assessment. As stated on page 6, target age, target sex and adoptable criteria are established without any regard to the biological requirements to sustain a viable population for this herd.

The plan identifies the problem of wild horse use of riparian habitats. However, the allotment evaluation and multiple use decision provided no monitoring data to support this conclusion. The intention to fence five springs to mitigate adverse impacts of livestock and wild horses has no schedule and will not meet the objective to achieve proper functioning condition of 75 percent of the riparian areas by 1997.

Mr. Mike Phillips  
February 13, 1995  
Page 2

Wild horse removals from outside of the herd management area should be subject to complaints or damage on private and other allotments.

Objectives for this herd should include criteria for genetic numbers, age structure, longevity and recruitment rates to assure the integrity of this herd. Due to less than 16 horses in the herd, removal of all horses less than 10 years could lead to a loss of the herd after one gather.

We cannot support the practice of weight averaging use pattern mapping data with riparian habitat.

ENVIRONMENTAL ASSESSMENT NV-30-95-013

Implementation of the "The Strategic Plan" criteria for adoption seriously threatens the viability of the South Stillwater Wild Horse Herd. Studies suggest that a wild horse herd must have at least 50 individuals to maintain its genetic pool. Mortality data from major gathers in Nevada suggest few horses live beyond 14 years of age. No data has been provided to support an assumption that 10 year old mares can continue to produce foals.

Re-structuring the population to sustain a viable herd is necessary to meet the National Environmental Protection Act. Since the "Strategic Plan" has no environmental assessment or environmental impact statement, this environmental assessment must address the issue.

There is no supportive data or document for conclusions found in the No Action alternative. Data suggest that wild horses are not increasing or decreasing under present conditions. If wild horses contribute to over grazing riparian areas, then a necessary adjustment for livestock and wild horses could be justified.

Sincerely,

CATHERINE BARCOMB  
Executive Director

# W H O A

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

2/1995



... a note from

Dawn Y. Lappin

Mr. James Phillips  
Lahontan Resource Manager  
Bureau of Land Management  
1535 Hot Springs Road, Suite 300  
Carson City, Nevada 89706-0638

SUBJECT: Draft HMAP/Capture Plan and EA for South Stillwater HMA

Dear Mr. Phillips:

Thank you for consulting WHOA concerning the South Stillwater Herd Management Area Plan and Environmental Assessment. The concerns for this herd is to protect wild horse habitat and assure that a viable population is preserved.

## SOUTH STILLWATER HERD MANAGEMENT PLAN

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We cannot support the practice of weight averaging use pattern mapping data with riparian habitat.


ENVIRONMENTAL ASSESSMENT NV-30-95-013

Implementation of the "The Strategic Plan" criteria for adoption seriously threatens the viability of the South Stillwater Wild Horse Herd. Studies suggest that a wild horse herd must have at least 50 individuals to maintain its genetic pool. Mortality data from major gathers in Nevada suggest few horses live beyond 14 years of age. No data has been provided to support an assumption that 10 year old mares can continue to produce foals.

Re-structuring the population to sustain a viable herd is necessary to meet the National Environmental Protection Act. Since the "Strategic Plan" has no environmental assessment or environmental impact statement, this environmental assessment must address the issue.

There is no supportive data or document for conclusions found in the No Action alternative. Data suggest that wild horses are not increasing or decreasing under present conditions. If wild horses contribute to over grazing riparian areas, then a necessary adjustment for livestock and wild horses could be justified.

Sincerely,

  
DAWN Y. LAPPIN  
Director