



United States Department of the Interior

Bureau of Land Management

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In Reply Refer To:
4700
(NV-032)

Ms. Catherine Barcomb
885 Eastlake Boulevard
Carson City, NV 89704

JAN 21 2004

Dear Ms. Barcomb,

We are in receipt of your fax dated December 1, 2003, regarding the draft Lahontan Herd Management Area Plan/Capture Plan and Environmental Assessment (EA-NV-030-03-030) Update. I offer the following response to your concerns regarding the draft plan update.

As we stated in appendix 1 (see below) of the draft update recognized experts in the field of population genetics dealing with wild populations feel that for a closed population, a population size of 5,000 individuals is required to maintain typical levels of heritable variance. Franklin and Soule feel that an effective population of 5,000 individuals is required which for a harem breeding animal would equate to an actual population much larger since the males do not contribute equally to the next generation.

We feel that no HMA is large enough to be managed in isolation and that for natural processes to occur the various populations of horses must be linked through immigration. During the evolution of horses, fences and other artificial barriers were not present to interrupt gene flow. However, due to fragmented land ownership and constraints of the Wild Horse and Burro Act, "natural" gene flow cannot occur. Therefore, if we are to manage wild horses as a viable entity over the long term we must physically move some animals between populations.

"Many species of vertebrates suffer from the deleterious effects of inbreeding depression if the population size is small and isolated. Inbreeding depression is manifested as decreased individual fitness and population growth rate" (Ralls and Ballou 1983; Falconer and Mackay 1996). "Based on estimates of mutability in quantitative characters (Lande 1976; Lynch 1988), Franklin (1980) and Soule (1980) recommended a minimum N_e of 500 to maintain typical levels of heritable variance. Recent experiments indicate that a large fraction of the mutational variance in quantitative characters is associated with recessive lethal and semi-lethal side effects such that the quasi-neutral, potentially adaptive fraction of mutational variance is about one-tenth as large as previously thought (Mackay et al. 1992; Lopez and Lopez-Fanjul 1993a,b). Lande (1995) suggested that the Franklin-Soule number should be increased by a factor of ten." (Lande 2002).

“Recent considerations of this problem have led to the recommendation that an effective population size (N_e) of approximately 1,000 individuals is needed to allow continued adaptive evolution and to avoid the accumulation of new harmful mutations. This recommendation would correspond to more than 5,000 individuals in many species. Such large populations will not be possible in many species except by increasing the connectivity among geographically separated populations over a wide area.” (Allendorf and Ryman, 2002).

In harem breeding animals, such as horses, an effective population will be much smaller than the census population. Since mating is not random, a relatively few dominant males are responsible for the majority of breeding. However, free roaming horses generally exhibit greater genetic diversity than most domestic breeds. Through the domestication process many deleterious alleles may have been purged thus allowing for greater inbreeding without the resulting deleterious effects of inbreeding depression. However, Allendorf and Ryman, (2002) assert that inbreeding depression is caused by many recessive alleles with minor deleterious effects therefore purging these numerous alleles is unlikely. Thus, a prudent manager would attempt to maintain as much genetic diversity as is practical.

“Inbreeding depression due to fixation of deleterious partially recessive mutations can be reversed, at least temporarily, by introduction of genes from unrelated individuals into an inbred population, which allows natural selection to eliminate the deleterious mutations. It can be permanently prevented by continued immigration every one or two generations of a single unrelated individual into each local breeding population regardless of its size (Lande and Barrowclough 1987). Such a plan was recently implemented for the endangered Florida panther, motivated by strong circumstantial evidence of inbreeding depression and its low genetic divergence from other conspecific populations. Such genetic augmentation may be sufficient to reverse inbreeding effects and not too high to swamp possible local adaptations (Hedrick 1995).” (Lande, 2002)”

From the above peer reviewed articles written by the above acknowledged experts in the field, a single unrelated individual introduced every one or two generations is all that would be required to avoid the deleterious effects associated with isolated populations. This could be accomplished by introducing a young mare into this HMA every five to ten. The horses within the Lahontan HMA do not possess any unique characteristics. There is an unusually high percentage of pinto coat color though this color is not considered unique.

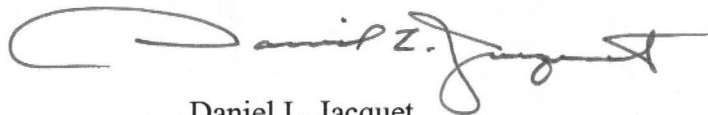
However, we do feel that perhaps an AML of 7 to 10 individuals is too small to warrant management and plan to evaluate this situation in the forthcoming Churchill County Land Use Plan Amendment.

The statement that no water exists within the HMA is correct. The horses within the HMA have always relied on the Carson River and Lahontan Reservoir for water which is managed by the State of Nevada, Division of Parks.

Since only four horses were identified in 1975, we have no basis to suspect that the herd area was incorrectly delineated. These four horses used public, private and State Parks land. Since no surface water exists on public land in this area the decision to designate the area as an HMA should be reevaluated. When a LUP revision is initiated for this area we will consider changing the HMA designation.

In your letter you state that "...recent research suggests that a minimum gene pool for a viable population is 75 breeding animals which would need an AML of up to 150 horses overall." This range is several orders of magnitude lower than what we have seen in the literature. Would you be so kind as to supply us with the citations since we are obviously keenly interested in the management of small populations.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel L. Jacquet". The signature is fluid and cursive, with a large initial "D" and a long horizontal stroke at the end.

Daniel L. Jacquet
Assistant Manager, Renewable resources
Carson City Field Office

2 Enclosures:

1. Lahontan HMAP and EA Update, Finding of No Significant Impact/Decision Record (51pp.)
2. Form 1842-1, Information on Taking Appeals to the Board of Land Appeals (2pp.)

**LAHONTAN HERD MANAGEMENT AREA PLAN/CAPTURE
PLAN UPDATE and ENVIRONMENTAL ASSESSMENT (EA)
No. EA-NV-030-03-030**

4700

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I. Introduction/Purpose and Need

Introduction

With passage of the Wild Free-Roaming Horse and Burro Act of 1971 (Public Law 92-195), Congress found that: "Wild free-roaming horses and burros are living symbols of the historic and pioneer spirit of the West". The Act states that wild free-roaming horses are to be considered in the area where presently found, as an integral part of the natural ecosystem of the public lands. The Secretary was ordered to "manage wild free-roaming horses and burros in a manner that is designed to achieve and maintain a thriving natural ecological balance on the public lands".

The BLM National Wild Horse and Burro Strategy includes establishing and achieving Appropriate Management Levels (AML) on all Herd Management Areas (HMA's) managed by the BLM, and to achieve and maintain AML on all HMA's implementing a 4-year gather cycle. The numbers of animals projected to be removed were estimated using a wild horse population model developed by Dr. Stephen Jenkins of the University of Nevada Reno, based on a four-year gather cycle.

The Lahontan Herd Management Area (HMA) is situated within the administrative jurisdiction of Carson City Field Office (CCFO). In 1991, a Herd Management Area Plan/Capture Plan (HMAP) was prepared for the HMA. That plan presented management direction for managing the horse population. The AML range for the Lahontan HMA is seven to ten.

This plan update supercedes the previous plan and presents management direction for the Lahontan HMA. The terms horse and wild horse, both (*Equus caballus*) are used synonymously throughout this document.

The Lahontan HMA is located approximately 40 miles east of Carson City, Nevada. The topography is essentially flat. Portions of the HMA boundaries are formed by the Lahontan State Park (map 1).

It is generally accepted that wild horses within the HMA originated from ranch stock that were released.

The HMA includes the entire herd area (11,029 acres), that area delineated as the wild horse habitat soon after passage of P.L. 92-195 (map 1).

Purpose and Need

The purpose and need of these actions are to achieve and maintain the HMA in a state of

thriving natural ecological balance and multiple use relationship between the wild horse population, wildlife, livestock and the plant communities. In addition horse specific information would be collected to assess the overall health of the horse population. Specific objectives include managing the population to preserve and enhance the historic physical and biological characteristics of the herd and preserving and maintaining a healthy viable wild horse population within the HMA.

Land Use Plan Conformance Statement

The proposed actions and alternatives described below are tiered to and in conformance with the Carson City Field Office Consolidated Resource Management Plan of 2001 (CRMP), pages WHB -1-5. This analysis was conducted under an intensive monitoring program addressing the impacts of wild horses and livestock. This EA is a project specific refinement of the EIS focused on the management of wild horses in the Lahontan HMA. The Appropriate Management Level (AML for the Lahontan HMA was established through the allotment evaluation and Final Multiple Use Decision (FMUD) process. The AML was set as a range.

The following decisions from the CRMP affect the Lahontan HMA:

1. Page WHB-2, decision 2- Maintain sound thriving populations of wild horses within HMAs.
2. WHB-3, decision 1 - Develop and implement an HMAP for the Lahontan HMA.
3. WDL-2, decision 4 – Maintain and improve wildlife habitat, including riparian/stream habitats (no riparian areas exist within the HMA), and reduce habitat conflicts while providing for other appropriate resource uses.
4. WDL-2, decision 5 – Maintain or improve the habitat condition of meadow and aquatic areas (this HMA does not include any water, meadow or riparian areas). Habitat condition for any wildlife species can be defined as the ability of a specific area to supply the forage, cover, water and space requirements of an animal. Habitat condition, therefore, is a measure of habitat quality, and is determined by assessments, surveys and studies.
5. WDL-2, decision 6 – Maintain or improve the condition of the public rangelands so as to enhance productivity for all rangeland values (including wildlife).

Relationship to Other Environmental Documents, Statutes and Regulations

The proposed action and alternatives are in conformance with the Wild Free-Roaming

Horse and Burro Act of 1971 (PL 92-195 as amended); all applicable regulations at 43 CFR 4700 and policies; the Strategic Plan for the Management of Wild Horses and Burros on the Public Lands; and the Nevada BLM Revised Tactical Plan – Wild Free-Roaming Horses and Burros, Ensuring the Legend Lives Free. These documents are available for public review at the Carson City Field Office.

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 including:

- a. Target specific age groups for removal.
- b. Target a specific sex for removal.
- c. Utilize fertility control techniques.
- d. Nevada and Wyoming will use a selective removal strategy with fertility control that will assure that AML's are reached within a six-year time frame.

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). In 43 CFR 4710.3-1 the authorized officer is directed to prepare Herd Management Area Plan (HMAP) for the management of HMA's.

Because of the small size of the HMA, necessitating a low AML fertility control will not be proposed for this HMA.

Other Activity Plans, Issues and Constraints

Existing Activity Plans have stated objectives and constraints relating to the HMA, and are summarized below.

1. Multiple Use Decision 1993:

In 1993, a Multiple Use Decision (MUD) was issued for the Lahontan Grazing Allotment, the HMA is situated completely within this grazing allotment. This decision divided the available forage between wildlife, wild horses and livestock. A specific Appropriate Management Level (AML) was set for the HMA, 7 -10 horses. This number was based on vegetation monitoring with the goal of achieving a thriving ecological balance between wildlife, wild horses, livestock and the vegetative community. Livestock were allocated 122 AUM's within the HMA. Wildlife use within the allotment was adjudicated in accordance with the Lahontan RMP - 1984.

2. Range Program Summary Update 1989 (now incorporated into the CRMP):

- a. Maintain utilization not to exceed 55% on key species on upland key areas (Range Program Summary Update 1989; RPS Update).
- b. Improve ecological condition in 20 years by 1 condition class (RPS Update, 1989).
- c. Maintain or improve willow and aspen stands to have at least 20% of all stems produce young over 5 feet (6 feet for aspen; RPS Update, 1989; not applicable for this HMA).
- d. Limit utilization on meadows in identified sage grouse habitat to leave a minimum of 4" of growth by 15 September (RPS Update, 1989; not applicable for this HMA).
- e. Limit utilization to 55% on current years growth on riparian areas (RPS Update, 1989; not applicable for this HMA).
- f. Insure against adverse physiological stress to wild horses by monitoring water availability (RPS Update, 1989).
- g. Maintain or improve wild horse habitat consistent with wildlife and livestock objectives (RPS Update, 1989).
- h. Maintain or improve free roaming behavior of wild horses by protecting or enhancing wild horse home ranges (RPS Update, 1989).

II. PROPOSED ACTION

The Proposed Action and two alternatives, one of which is the No Action Alternative, are analyzed within this document and impacts identified. The description of all the alternatives is given below.

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 adjusting the population of wild horses to a level in balance with the forage productivity of the habitat within the HMA (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 would allow the animals to maintain themselves in a healthy condition, better able to withstand environmental fluctuations.

Prior to future removals current monitoring data will be analyzed to determine if the AML's set in the multiple use decisions are still appropriate. Future gathers may be postponed if current data indicates that the HMA can support an increased horse population.

Objective 2

Maintain the free-roaming nature of the wild horses.

Management Method

All projects proposed on BLM administered land within the HMA 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 HMA.

Management Method

Improve the habitat within the HMA and identify key habitat areas within the HMA through monitoring efforts. Maintain the fences along allotment boundaries where they form part of the HMA boundary.

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

Objective 4

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

Management Method

Maintain an interval between removals of at least 3 to 4 years. Managing the horse population within the range set through the MUD process would increase the time interval between captures, thereby reducing stress, injuries and deaths associated with capture operations.

Wild horse populations have an average rate of increase of between 14% and 24% annually (Garrott, 1990). From monitoring data, an annual growth rate of at least 19% can be expected under reasonable population levels in this HMA. By reducing the population of wild horses within the HMA to a point below the maximum number of wild horses that the habitat can support and allowing the population to build back up to the maximum level the next removal could be delayed for 3 to 4 years. The number of wild horses would not exceed 10 and would help achieve Habitat Objective 1.

Various forms of contraceptives (Strategic Plan) may be used to slow the rate of increase. However, due to the low number of horses that this HMA is capable of supporting contraceptives were not considered.

If wild horses were reduced to 10 individuals (the high end of the AML), gathers would need to be conducted yearly which would lead to frequent band disturbances and other forms of stress. Furthermore, yearly gathers would not be physically or fiscally feasible. Removal procedures are contained in Appendix 1. Maintain the wild horses population within the range of 7 to 10 individuals.

Utilize a helicopter to herd horses into corrals constructed out of portable steel panels. Other motorized equipment would also be used in the transport of captured horses.

Mares with foals or foals, which have become separated from their mothers may need to be roped. However, based on past removals it is anticipated that less than 1 percent of the animals would require roping.

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 5: Place only adoptable horses into the adoption program.

Management Action: To the extent possible 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 HMA, placed into a sanctuary or released back into the HMA. However, during the next gather and possible subsequent gathers horses 5 years old and younger would be placed into the adoption program, horses 6 - 10 years of age would be released back into the HMA and older animals placed into a sanctuary, although some of the 6 – 10 years old animals may be removed if needed to reach AML.

Once the Bureau attains AML on a national basis, and gathers occur on a 3 to 4 year cycle AML's would be maintained by only removing younger more adoptable and adaptable animals.

Place horses removed from areas outside of the HMA into the adoption program, sanctuaries or other HMA's regardless of age.

Objective 6: Identify individual animals for population studies and to facilitate identification of animals illegally removed from the HMA.

Management Action: Using freeze- marking techniques, a unique number may be placed on the left hip of the animals that are to be returned to the HMA. These horses are restrained in a squeeze chute for ageing and blood drawing, by applying a freeze mark the animals would be restrained for an additional 90 to 120 seconds.

Objective 7: Track loss of heterozygosity and alleles.

Management Action: During periodic removals blood samples would be drawn from some of the captured animals for analysis. As with applying a freeze mark this action would only add 90 to 120 seconds of additional squeeze chute time for the horses identified to be sampled, and would result in negligible additional increases of stress.

Objective 8: Identify prevalence of distemper.

Management Action: During periodic removals nasal swabs maybe collected from some animals. As with applying a freeze mark this action would only add 90 to 120 seconds additional of squeeze chute time for the horses identified to be sampled, and would result in negligible additional increases of stress.

Objective 9:

Maintain genetic diversity.

Management Method

Animals from other HMA's within this Field Office may be released into the HMA to allow for gene flow, thereby avoiding any deleterious affects of inbreeding resulting from small population size.

B. Habitat Objectives

Objective 1

Allow no more than 55% utilization on key grass species (Indian ricegrass, Idaho fescue, needle grass) and 40% on interim grass species (bottlebrush squirreltail and bluegrass) yearlong.

Management Method

As stated (vegetation section) the present stocking rate over the entire HMA needs to be adjusted downward. Based on current data an adjustment of the horse population within the HMA is required. During the 2002 – 2003 monitoring period more than 80% of the HMA sustained severe use, and the heavy use area was rated at 80%, one percentage point below severe.

Based on vegetative monitoring a reduction in horse numbers down to the AML is needed over the entire HMA.

ALTERNATIVES

Alternative 1

Alternative 1 is identical to the proposed action with the exception that the population would only be reduced to the upper end of the AML.

No Action Alternative

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

Alternatives considered but not analyzed

Herding from horseback and water trapping were considered, however, they are not feasible for this HMA. The only possible exception would be if a small number of horses became a nuisance on private property, such as alfalfa fields where a small strategically placed trap may be practicable.

III AFFECTED ENVIRONMENT

PROPOSED ACTION

General Setting

The HMA is located within a portion of the Lahontan Allotment south of the Lahontan reservoir and Carson River Delta. Median elevation is approximately 1,200m. The dominant vegetation consists of Bailey greasewood (*Sarcobatus vermiculatus*), shadscale (*Atriplex confertifolia*), bottlebrush squirreltail (*Sitanion hystrix*), Indian ricegrass (*Oryzopsis hymenoides*), and Needle-and-thread (*Stipa comata*).

Critical Elements of the Human Environment

The following critical elements of the human environment are not present or are not affected by the proposed action or alternatives in this EA:

- Air Quality
- Areas of Critical Environmental Concern
- Cultural Resources (trap site locations would be surveyed prior to construction, trap sites will be placed in areas devoid of significant cultural resources)
- Environmental Justice
- Farm Lands
- Flood Plains
- Hazardous Materials
- Invasive Non-native species
- Native American Religious Concerns
- Paleontology (trap sites would be cleared prior to construction)
- Wild and Scenic Rivers
- Threatened or Endangered Plant Species (none known to exist within the HMA)
- Water Quality (Surface/Ground)
- Wetlands/Riparian
- Wilderness

Resources Present:

III A. Wildlife

The HMA includes habitat for mule deer, birds, reptiles and many other species. However, due to the small size and relatively homogenous plant community the wildlife community is relatively depauperate when compared to other HMA's within this Field Office.

III B. Threatened or Endangered Animal species

There are no known threatened or endangered species found within the HMA. However, a category 2 candidate species, the loggerhead shrike may nest in the area.

III C. Migratory Birds

Several species of migratory birds inhabit the HMA, including, shrikes, night hawks, fly catchers, kingbirds, raptors, sparrows, requiring diverse habitat types.

III D. Wild Horses and Burros

The HMA contains approximately 11,029 acres of public and private land. The AML range for the HMA is 7 to 10 horses. At the present time, the wild horses have unrestricted movement within the HMA, allotment and much of the State Parkland where they are causing substantial damage to State Park fences and riparian habitat important to many species of birds. Almost all of the wild horses are now using areas outside of the HMA, as all or part of their home range. This is primarily due to an increase in the population beyond that which the HMA can support. The population is estimated to be over 200 animals. An estimated 4 wild horses (Appendix 2) occupied the HMA in 1971, after the passage of the Wild Horse and Burro Act.

Other Resources Present:

III E. Livestock Use

The HMA lies within a pasture of the Lahontan Grazing Allotment, however, due to over use by wild horses and drought conditions the permittee has not placed cattle on the allotment for the past two years.

III F. Recreation

Traditional forms of recreation such as sightseeing, driving for pleasure on roads and ways, camping, hunting, hiking, photography and nature study occur within this HMA.

III G. Soils and Vegetation

The majority of the Lahontan HMA consists of deep sandy soils (Patna, Hough, Isolde, and Rusty soil series) that are intermixed with areas of small sand dunes, badlands and playettes. The hazard of wind erosion is moderate to high, and soil reaction ranges from mildly alkaline or neutral, to strongly saline in the playettes.

The southeastern portion of the HMA consists of deep, fine-textured soils (Lahontan, Orizaba, and Delp soil series) that are strongly alkaline to strongly saline. The hazard of water or wind erosion is slight in this area and soil permeability is very slow. Water may pond for short periods following precipitation events.

Precipitation in the HMA is low, averaging 10 – 15 cm per year.

Three major range sites (27-009, 27-018 and 27-025) comprise 95% of the HMA and are described below:

Sandy 13-20 cm, 25 to 30 cm precipitation zone. (027XY 009NV)

1. Associated species: Indian rice grass, needle-and-thread, four-wing salt brush, winter fat, Nevada delea and Bailey greasewood.
2. Occurs on remnants and inset fans. It also occurs on sand sheets deposited over various land forms. Slopes range from 0 to 30 percent. Elevations are 1,200 m to 1,700m.
3. Soils are very deep, somewhat excessively drained and formed in alluvium.
4. Annual production in average years is 204 kg/acre.

Gravelly Loam 10 to 15 cm precipitation zone. (027XY 018NV)

1. Associated species: Indian ricegrass, bottlebrush squirreltail, shadscale, Bailey greasewood and bud sagebrush.
2. Occurs on fan piedmonts. Slopes range from 0 to 30 percent, but slope gradients of 2 to 15 percent are most typical. Elevations are 1,200 m to 1,700m.
3. Soils are deep to very deep, well drained and formed in alluvium.
4. Annual production in average years is 136 kg/acre.

Sodic Flat 10 to 20 cm precipitation zone. (027XY 025NV)

1. Associated species: Inland saltgrass, black greasewood, shadscale and seepweed.
2. Occurs on the lower portion of fan skirts and upper alluvial flats. Slopes range from 0 to 4 percent. Elevations are 1,070m to 1,676m.

3. Soils are deep, well drained and formed in mixed alluvium.
4. Annual production in average years is 90 kg/acre.

III H. Sensitive Plant Species

There are no known sensitive plant species within the HMA.

III I. Visual Resources

The proposed plan would take place on lands managed under Class III Visual Resources management (VRM) objectives. In a Class III area the objective is to partially retain the existing character of the landscape. The level of change should be moderate. Management activities may attract attention but should not dominate the view of the casual observer. Changes should repeat the basic elements found in the predominant natural features of the characteristic landscape.

IV. ENVIRONMENTAL CONSEQUENCES

Proposed Action

IV A. Wildlife

Managing horses within a range of 7 to 10 individuals (total utilization $\leq 55\%$) would have positive impacts on wildlife by insuring adequate forage and habitat for wildlife species. This range of horse numbers would help in providing habitat requirements for wildlife.

IV B. Threatened or Endangered Animal Species

There are no known threatened species within the HMA.

IV C. Migratory Birds

By managing the herbivores (horses and livestock) so that the vegetation is maintained at levels stated in the CRMP, Sierra Front Northwestern Great Basin Area Standards and Guidelines, habitat requirements for most species of migratory birds would be expected to be met. Riparian areas, outside of the HMA, in the State Park would be expected to recover and provide habitat for many migratory birds. In the past Yellow-billed cuckoo's (*Coccyzus americanus*) have been recorded nesting along the Carson River Delta.

IV D. Wild Horses and Burros

The main issue with this HMA involves the propensity of the horse population to increase at relatively high rates (15 - 20% annually). Few adult horses or foals within this HMA succumb to predation the only "natural" population regulating mechanism would be the availability of forage. However, before the horse population would be limited many native species of wildlife would have been eliminated from the HMA and surrounding area. Also, many native plants would have disappeared facilitating the establishment and expansion of non-native noxious weeds. When unchecked a population of horses can have devastating effects on native vegetation, wildlife and the livestock industry.

By managing the population of horses within the AML range a healthy population would result, insuring the persistence for generations to come.

From analysis of monitoring data it was determined that 10 horses are the maximum that the HMA can support while maintaining thriving natural ecological balance between vegetation, horses, wildlife and livestock. In order to minimize the stresses and disruption of band structures the population of wild horses would be reduced below 10 and allowed to increase back to 10. Based on recent rates of increase (19% annually) the population would need to be reduced to 7 animals in order to maintain acceptable utilization levels during gather intervals.

Managing horses between 7 - 10 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 stresses would be especially important to the young animals. Managing the population in a way that 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). Furthermore, it is not physically or fiscally possible to capture horses in the same HMA every year. If horses were allowed to increase above the AML, resource damage would occur adversely affecting the vegetative community, wildlife community, horse population, livestock producers and recreationalists who would be disappointed in seeing degraded communities lacking species diversity.

Managing the wild horses within a range (i.e. 7 - 10) would require that the population be reduced below the maximum allowable population level (10). 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 and livestock grazing) would reduce the stress of gathers by allowing an interval of approximately 3 to 4 years between gathers.

The release of unadoptable horses from other HMA's would tend to increase allelic diversity and would be expected to compensate for alleles lost by stochastic events thus maintaining heterozygosity. Furthermore, introduction of new genetic material would aid in maintaining and increasing the natural variability of the population. All impacts would be positive.

Prior to the extirpation or near extirpation of the ancestral horses (Asia) from which the domestic breeds were derived and consequential feral horse populations, the progenitor wild horses were likely distributed in large out breeding populations. However, for a variety of reasons present day feral horses cannot be managed in large populations due to land use practices, and vegetative constraints on population size. In addition, the Wild Horse and Burro Act, limited management of "wild" (feral) horses to the geographic area which they inhabited in 1971. However by moving animals between HMA's we can in a genetic sense link the HMA's creating a large outbreed population of horses.

During periodic removals, animals captured from areas outside of the HMA would either be placed into the adoption program, released into other HMA's or released back into the HMA as far from the point of capture as possible. However, 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 HMA would only be done when other alternatives are not practical or available.

Discussion has occurred regarding the appropriate sex ratio for free ranging populations of horses. It is intuitively obvious that fewer excess animals would result from biasing a population to favor male animals, however, some individuals have asserted (without any data to substantiate their claims) that if the percent of males surpasses some threshold civil unrest would occur resulting in increased aggression between males as they now must divide up fewer females between them. Based on 70 years of collective experience managing free roaming horses in this field office we doubt the before mentioned scenario, once horses have established a hierarchy few subsequent bouts of aggression occur. In any "natural" population of feral horses the majority of males will not control harem bands, they will be found either singularly or in small loosely knit bands. We believe that biasing a population to favor males would result in smaller and more numerous harem bands and larger or more numerous bachelor bands, which would not adversely impact the social structure of the population. The only effects would be positive, fewer animals would need to be removed and placed into the adoption program and the duration between gathers may be increased. Unfortunately we do not have any data to substantiate our assertion therefore, we did not consider this option for an alternative.

Within the Carson City Field Office 3,665 (49.5%) female wild horses have been removed and 3,732 (50.5%) male horses have been removed (wild horse and burro data base). Thus, the gather data suggests a slight bias, favoring males; in addition, during gathers a

disproportionate percentage of females are collected due to the inherent biases of the gather techniques. Male horses are found in smaller bands or singularly, decreasing their rate of delectability also bachelor bands do not herd as effectively as harem bands. Because pilots contracted to gather horses are paid per horses captured they focus on harem bands thus, to a certain extent ignoring bachelor bands, resulting in a biased sex ratio at the trap site.

Unfortunately we do not have any data on the magnitude of the trap site bias. However, intuitively one would suspect a greater percentage of male horses than female horses in a "natural" setting. This bias would result from greater number of females dieing after birth due to the increased stresses of reproduction and lactation including parturitions gone terribly bad, resulting in the death of the mare. A mare must divert a substantial amount of energy to produce a foal and ensuing lactation for the next year or more, increasing her susceptibility to adverse environmental conditions and predation by mountain lions.

Male horses while they control a band also undergo increased stresses compared to their bachelor cohorts. However, due to the keen competition for females, harem-controlling males will generally loose control of harems long before their physical condition is compromised to a dangerous level. Thus, the sex ratio is not at parity and males tend to accumulate in the population. Therefore, we contend that biasing the sex ratio to favor males would not be "unnatural" and have only positive effects for the population and the taxpayer.

Removing young animals would result in removing only readily adoptable animals (young animals) and slow the rate of increase. However, for the next 1 or 2 removals it is expected that some older animals would need to be removed in order to attain AML, these horses would be placed in sanctuaries. Once AML is reached and removals occur approximately every 4 years a minimal number of animals would need to be placed into the adoption program and the interval between gathers could be maximized.

A program developed by Stephen Jenkins (WinEquus, version 1.40, April 2002) was used to compare possible outcomes of various management scenarios designed to provide individuals interested in population dynamics an understanding of possible population responses to various management strategies was run for the targeted population levels of this HMA using several scenarios, namely: removals only, and no management. Dr. Jenkins does make the disclaimer that this model should not be used to make management decisions, the intended use is to convey a range of possible population responses to certain perturbations. These different scenarios provide a forecast regarding the number of expected excess horses in the future, which would be considered when selecting the preferred alternative and described in appendix 2.

Under the removal only scenario the median population size over 21 years was 12 and the median number of animals removed was 37 exclusive of the number required during the first removal.

Under the no management scenario the median population size was 2,498 with an ending median population of 7,595 and a highest trial population of 16,568. Obviously the HMA could not sustain a population of 2,498 horses much less a population of 16,568. Before the population reached these levels the HMA would have been converted to a veritable desert with noxious weeds the only remaining vegetation, most species of native wildlife would have disappeared and the allotment involved would no longer be capable of supporting livestock.

Additionally a scenario of only reducing the population to the upper AML level was examined. Obviously under this scenario with the birth of the first foal post removal the HMA would be over AML, thus over stocked. The AML range was designed to prevent over stocking and the problems associated with over stocking. Under the removal only scenario where the population was only reduced to the upper AML the median population size over 21 years was 14 and the median number of animals removed was 42 exclusive of the number required during the first removal.

Clearly maintaining the population within the AML range results in fewer total animals removed over the 20 year time frame.

Results from Dr. Jenkins's model:

Table 1. Rate of Increase and Median number of horses removed under the different alternatives.

| Alternative | Median Pop. Size | Rate of Increase | Median # Removed 20 yr. |
|---|------------------|------------------|-------------------------|
| Proposed Action, Removals | 12 | 21.3% | 37 |
| Alternative 1. Removal Only to Upper AML. | 14 | 16.9% | 42 |
| No Action ¹ | 2,498 | 20.1% | |

¹At the end of 20 years the median population was 2,498, however, the median maximum was 8,682 and the highest trial was 16,568 animals.

See appendix 2 for population parameters and more detailed results.

Other Resources Present:

IV E. Livestock Use

By managing horses at the identified levels forage would be available for grazing by livestock which would help meet RMP objectives and would allow a thriving ecological balance to be obtained and maintained between the vegetative community, wildlife, horses and livestock. This would result in positive impacts. The vegetative community, horse populations and wildlife populations would be stabilized. It is anticipated that after the reduction the utilization would decrease to 55% on key species. Horses that are removed would be placed into private maintenance through the Bureau's Adopt a Horse Program, sanctuaries or other HMAs.

IV F. Recreation

As the habitat improves, the esthetics would improve, as would most wildlife populations, increasing the overall recreational experience.

IV G. Soils

By maintaining a healthy plant community soil infiltration, runoff and erosion would remain within natural parameters.

IV H. Visual Resources

As the habitat improves as a result of plan implementation there may be minor improvement to the visual resources of the HMA. In general however, there would be no significant impacts to visual resources. The proposed action would not substantially alter the existing visual character of the landscape and would meet Class III VRM objectives.

ALTERNATIVES

Alternative 1

Alternative 1 is identical to the proposed action with the exception that the population would only be reduced to the upper end of the AML, however, with the birth of the first post gather foal the population would be over AML and the horse population would not be in a state of thriving natural ecological balance. However, due to budgetary constraints this alternative may need to be selected. The horse population would be over AML, however, the numbers would be substantially less than the current numbers and there would be improvements within the vegetative community, though not as great as would be expected under the proposed action. It is expected that Alternative 1 would only be selected for the first gather implemented under this plan and that the horse population would be reduced to the lower

AML during subsequent gathers/removals implemented under this plan.

All resources would be substantially improved over the current situation, although some long-term effects may return as the population increases.

No Action Alternative

The No Action Alternative would not include any of the objectives and management actions. The wild horses would not be maintained at a level compatible with their environment, and would continue to increase. Eventually all or most riparian areas on the State Park would be destroyed resulting in the loss of many native species of animals and plants, the upland grasses would also be removed resulting in the loss of many other species of animals. As the grasses become over grazed sagebrush and other woody plants become dominant, also as the native vegetation, both riparian and upland grasses become stressed by over grazing invasion by non-native weeds is facilitated, both the encroachment of woody plant species and establishment of invasive weeds may be irreparable, potentially changing the range site for many decades, certainly longer than any of our planning horizons.

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 and livestock. 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. Thus, the HMA's capacity to support horses would now be only a small fraction of its current potential capacity and it would take many decades of low or no grazing pressure and tremendous vegetative manipulation at a huge cost for the HMA to recover to its former potential carrying capacity. The no action alternative would also preclude attainment of wildlife, soil, water and livestock objectives in the RMP.

Habitat improvement would not be realized with this alternative. The frequency of key species would decline. The animals would continue to search for food and further degrade their habitat, thereby reducing the carrying capacity of the area, which would eventually lead to unacceptable adverse physiological stress to the horses and degraded vegetation condition.

Over utilization within and outside of the HMA would continue to occur and as the range becomes further deteriorated the carrying capacity of the HMA and allotments would be reduced. The objective of limiting utilization to 55 percent or less would never be met. Downward trend would occur, and ecological condition would decline. In the long-term, the excessive utilization would eliminate nearly all the forage plant species. Attainment of RMP objectives would not be met.

Further deterioration of the range would occur and the area would not be in a state of thriving ecological balance between wild horses, wildlife, vegetation and livestock.

Resources would be adversely affected compared to the Proposed Action or Alternative 1 as the vegetative community would sustain substantial over use.

Mitigating Measures

Under the Proposed Action or Alternative 1, no mitigation is necessary. Under the No Action Alternative no mitigating measures are practical.

Cumulative Impacts

Cumulative impacts are impacts on the environment, which result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively major or problematic actions taking place over a period of time.

Past, proposed and reasonably foreseeable actions that may have similar effects to the Lahontan HMA horse population would include past removals and future removals. Three removals have been completed in the past, and future gathers and removals would be scheduled according to a 3-4 year gather cycle. Should the Proposed Action be implemented the horse population would be maintained at a level compatible with the vegetative community and other uses, a thriving natural ecological balance would be achieved. Should Alternative 1 be selected the horse population would be over AML with the birth of the first post removal foal, however, the adverse impacts to the vegetative community would be substantially less than the no action alternative. Due to budget constraints Alternative 1 may be selected for the first removal action of this plan. Cumulative effects of both the Proposed Action and Alternative 1 would include continued improvement of the range condition, and riparian-wetland condition on the State Parks. Additional cumulative beneficial effects from implementation of the Proposed Actions or Alternatives 1 to wildlife, the horse population and domestic livestock would occur as forage availability and quality is maintained and improved. Water quality and riparian habitat would also continually improve.

Adverse cumulative impacts, would occur if the No Action Alternative is implemented, these effects would include continual over utilization of vegetative resources, which would result in decreased vegetative density, plant vigour, seed production, seedling establishment, and forage production. This would ultimately result in decreases of the ecological status of plant communities.

Wildlife, migratory birds, and horses would all be negatively affected by these adverse cumulative impacts to natural resources.

Wild horses would continue to expand onto State Park and private lands and other areas outside of the HMA negatively impacting State and private property.

Based upon these considerations, the effects of other existing and reasonably foreseeable future activities including the Proposed Action and Alternatives 1, would not cause a major affect to the environment. The No Action would cause a major non-mitigatable impact to the environment.

There would be no known adverse cumulative impacts to any of the resources analysed in this document as a result of the Proposed Action or Alternative 1.

Monitoring

A. Animal Studies

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

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 HMA in order to make quantifiable decisions with regard to wild horse, cattle and wildlife numbers by season of use.

Method: Helicopter censuses would be the method used to estimate the wild horse population in conjunction with on the ground identification of individual animals. These censuses would occur at 3-year intervals or less. Actual use by wild horses would 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. Also data on the sex and age structure of the herd is needed.

Method: Capture data, ground and aerial observations will provide baseline data. This will aid in determining the efficacy of different management strategies. Data will be analyzed using baseline parameters specific to this HMA where applicable. Age structure and annual rates of increase have been obtained from past gathers and aerial census. Also, age specific

mortality and fecundity rates may be obtained from published data (Feist 1975; Wolfe 1980, 1989; Eberhardt 1982; Seal 1983; Siniff 1986; Garrott 1990a, 1990b, 1991a, 1991b, 1991c, 1991d; Eagle 1992).

3. Genetic Diversity

Need: Data are needed to monitor the genetic diversity of the herd.

Method: As the animals are aged blood samples will be drawn and later analyzed by a private contractor in order to monitor changes in allelic frequencies in accordance with the Gather Policy and Selective Removal Criteria for Wild Horses, Washington Office IM 2002-095. Minimum sample size is 25% of the upper end of the management range or a minimum of 25 samples, though no more than 100 samples will be needed from any one HMA. A veterinarian or other trained personnel would collect the blood samples.

4. Characteristics

Need: Data are needed regarding the historical physical characteristics of the herd.

Method: During the sorting of captured animals color and size would be recorded. The general characteristics would also be noted. Also, incidence of undesirable genetically determined traits, such as albinism, and club feed etc., will be documented.

5. Condition Class

Need: The physical condition of the animals is needed to assess overall herd health.

Method: The condition class would be recorded using the Henneke System for those animals that are exceptions to the average, such as noticeably thin, or fat.

B. Habitat Studies

The Lahontan Resource Area Vegetation Inventory of 1980-1982 collected the following data on ecological condition classes for sites in the Lahontan Grazing Allotment other than woodland and seedings.

Table 2. Percent Ecological Condition

| Allotment | Early Seral | Mid Seral | Late Seral | PNC* |
|-----------|-------------|-----------|------------|------|
| Lahontan | 14% | 54% | 32% | <1% |

*Potential Natural Community (PNC)

The selection of studies methodology and key area/key species to which these studies are correlated was made in accordance with procedures established in the Nevada Rangeland Monitoring Handbook (NRMH) and the District's Monitoring Plan.

1. Utilization

Implementation of Habitat Objective 1 would require maintaining utilization levels at or below 55% on key grass species (Indian rice grass and; level recommended in the Nevada Rangeland Monitoring Handbook), and to 40% on bottlebrush squirreltail and Poa.

Need: To determine the amount of use (degree of utilization) attributable to wild horses, livestock and wildlife.

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

2. Trend

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

Method: Frequency transects at key areas are read 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 would be measured for each key area following MH 4400-1 guidelines (Natural Resource Conservation Service Range Handbook) to assure progress towards desired seral stages.

Method: Once key species are identified a key area condition transect would be done. Key area condition transects would be re-evaluated upon measurement of a statistically significant change in frequency data. These results would be evaluated to determine change in frequency data (trend). Furthermore, results would also be evaluated to determine if the

appropriate objectives have been realized. (Refer to Nevada Rangeland Monitoring Handbook p. 13).

Evaluation

All adjustments in livestock and wild horse use in the Lahontan HMA would be based on rangeland monitoring. Monitoring information would 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 would be analyzed to determine if Habitat Objective 1 is being achieved. Actual use would 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 would be based upon allotment monitoring. Future Multiple Use Decisions may amend the numbers specified in this plan.

Riparian areas provide critical habitat to many species of wildlife. Riparian areas comprise less than 5 percent of the habitat in Nevada though these areas are critical for over 90 percent of the species during some part of their life history, as stated before there are no riparian areas within the HMA, however, the horses are causing substantial damage to the extensive riparian areas administered by the State Parks.

The ultimate aim for horse management is the attainment and maintenance of a thriving "natural" ecological balance between the vegetative community (uplands and riparian) and the herbivorous including wildlife and livestock. To these ends herbivore management is constrained by the ability of the vegetative communities to resist the adverse effects of grazing.

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

By maintaining the vegetative communities in a healthy state availability of ample forage resources would be assured for all of the herbivores thus the horse population would be maintained in a healthy state in balance with the vegetative, wildlife (including migratory birds) and livestock communities.

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 would 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 HMA would be removed as soon as is practical.

Results of the soil monitoring studies would also be used as an indication of attainment of Habitat Objective 1 and 2.

Helicopter censuses would be the method used in identifying the need for removals in accordance with Animal Objective 1.

Young/adult ratios may indicate that removals need not be as frequent as estimated or they may indicate that more animals need to be removed or contraceptives employed.

Prior to future removals current monitoring data will be analyzed to determine if the AML's set through the multiple use decision process are still appropriate. Future gathers may be postponed if current data indicates that the HMA can support an increased horse population. Also, future gathers may decrease the horse population below the minimum AML if current monitoring data indicate that the AML is too high for current range conditions.

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 would result from ongoing monitoring.

V. CONSULTATION AND COORDINATION

List of Prepares:

John Axtell, Project Lead/Wild Horses
James M. Gianola, WH&B Program Lead
Peggy Waski, Cultural Resources
Terry Knight, Recreation, Visual Resources
Walt DeVours, T&E Species, Wildlife
Katrina Leavitt, Range Resources
James DeLaureal, Soils/Invasive Non-Native Species
Jim Schroeder, Water Resources
Terri Knutson, Environmental Coordinator

Persons, Groups or Agencies Consulted:

This draft HMAP / Capture Plan and EA update has been sent to the following persons, groups and government agencies in order to solicit comments.

American Horse Protection Assoc.
American Humane Association
American Mustang and Burro Assoc.
Andrea Lococo
Animal Protection Institute
Ann Kersten
Barbara Flores
Craig C. Downer
Elaine Letcher
Fund for Animals
Gary Snow
Gary McCuin, Agriculturist
Jan Nachlinger
Joanne Hardesty
Joe Dahl
Joe McGloin
John Davis
Karen Sussman
Lahontan State Park
Lura Weaver
Mace Bergmann
Marge Sill
National Audubon Society
National Mustang Association
National Wildlife Federation
Natural Resources Defense Council
Nevada Cattlemen's Association
Nevada Commission for the Preservation of Wild Horses
Nevada Department of Wildlife, Region I.
Nevada Humane Society
Nevada State Clearinghouse
Nevada State Division of Agriculture
Nevada State Grazing Board
NORA
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Office of Sen. Ensign

Office of Sen. Reid
Paul Clifford
Paul Inchauspe
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Resource Concepts Inc.
Roberta Royle
Rose Strickland
Sharon Crook
Sierra Club, Toiyabe Chapter
Steven Fulstone
The Mule Deer Foundation
The Sierra Club
U.S. Fish and Wildlife Service
U.S. Humane Society
Wild Horse Organized Assistance

VI. APPENDICES

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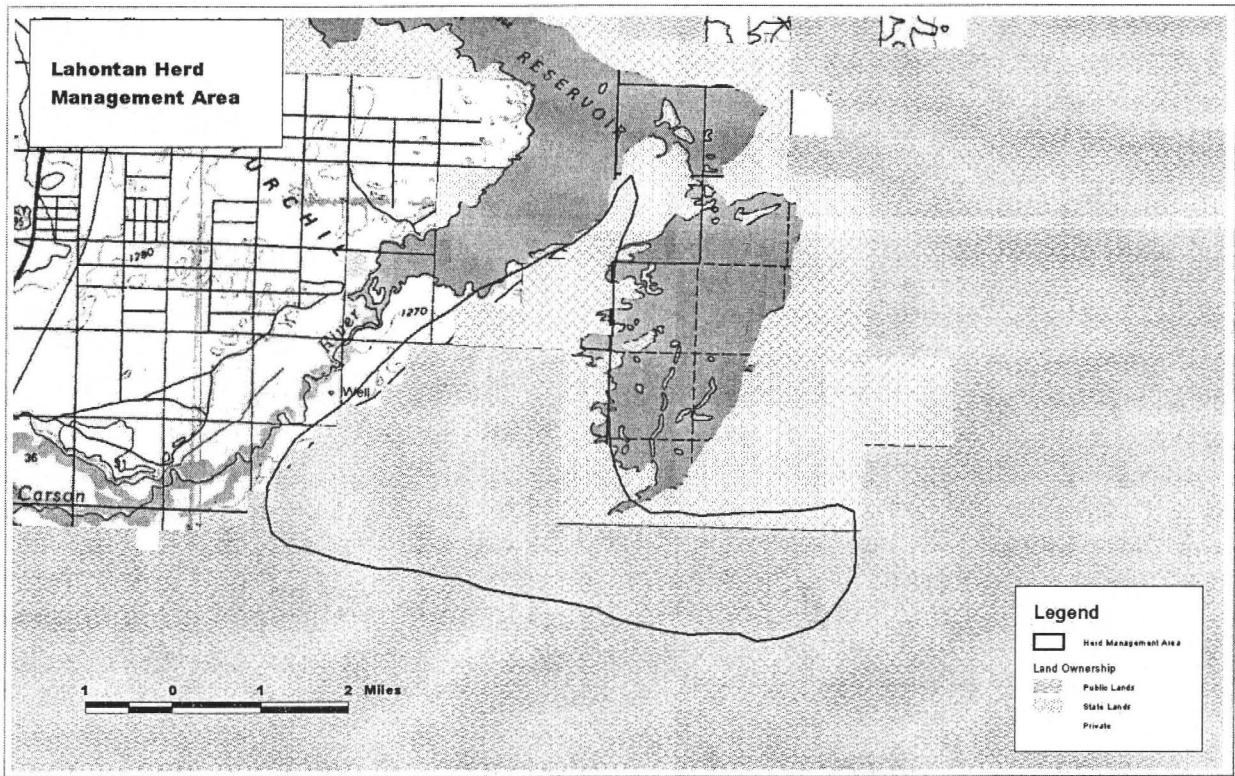
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HMA Map



Appendix 1, Minimum Viable Populations

Many species of vertebrates suffer from the deleterious effects of inbreeding depression if the population size is small and isolated. Inbreeding depression is manifested as decreased individual fitness and population growth rate (Ralls and Ballou 1983; Falconer and Mackay 1996). "Based on estimates of mutability in quantitative characters (Lande 1976; Lynch 1988), Franklin (1980) and Soule (1980) recommended a minimum N_e of 500 to maintain typical levels of heritable variance. Recent experiments indicate that a large fraction of the mutational variance in quantitative characters is associated with recessive lethal and semi-lethal side effects such that the quasi-neutral, potentially adaptive fraction of mutational variance is about one-tenth as large as previously thought (Mackay et al. 1992; Lopez and Lopez-Fanjul 1993a,b). Lande (1995) suggested that the Franklin-Soule number should be increased by a factor of ten." (Lande 2002).

"Recent considerations of this problem have led to the recommendation that an effective population size (N_e) of approximately 1,000 individuals is needed to allow continued adaptive evolution and to avoid the accumulation of new harmful mutations. This recommendation would correspond to more than 5,000 individuals in many species. Such large populations will not be possible in many species except by increasing the connectivity among geographically separated populations over a wide area." (Allendorf and Ryman, 2002).

In harem breeding animals such as horses, an effective population will be much smaller than the census population, since matings are not random, a relatively few dominant males are responsible for the majority of matings. However, free roaming horses generally exhibit greater genetic diversity than most domestic breeds. Through the domestication process many deleterious alleles may have been purged thus allowing for greater inbreeding without the resulting deleterious effects of inbreeding depression. However, Allendorf and Ryman, (2002) assert that inbreeding depression is caused by many recessive alleles with minor deleterious effects therefore purging these numerous alleles is unlikely. Thus, a prudent manager would attempt to maintain as much genetic diversity as is practical.

"Inbreeding depression due to fixation of deleterious partially recessive mutations can be reversed, at least temporarily, by introduction of genes from unrelated individuals into an inbred population, which allows natural selection to eliminate the deleterious mutations. It can be permanently prevented by continued immigration every one or two generations of a single unrelated individual into each local breeding population regardless of its size (Lande and Barrowclough 1987). Such a plan was recently implemented for the endangered Florida panther, motivated by strong circumstantial evidence of inbreeding depression and its low genetic divergence from other conspecific populations. Such genetic augmentation may be sufficient to reverse inbreeding effects and not too high to swamp possible local adaptations (Hedrick 1995)." (Lande, 2002)

Appendix 2, Population Data

Table 3. Population data.

| Census Date | Number of Horses Counted Inside the HMA | No. Removed |
|-------------|---|-------------|
| 1975 | 4 | |
| 1982 | 42 | |
| 1984 | 21 | |
| 1986 | 130 | |
| 1987 | 143 | |
| 1988 | 172 | |
| 1989 | 185 | |
| 1991 | 233 | |
| 1991 | | 146 |
| 1991 | 87 | |
| 1993 | 112 | |
| 1994 | | 69 |
| 1994 | 43 | |
| 1995 | 71 | |
| 1996 | | 29 |

All censuses were conducted with rotary wing aircraft.
The following parameters were used:

Table 4. Initial age distribution post-gather

| Age Class | Females | Males |
|-----------|---------|-------|
| 5 | 1 | 1 |
| 5 | 1 | 1 |
| 7 | 1 | 1 |
| 8 | 1 | 1* |
| 9 | 1* | 1* |

*Used for simulation of management to upper AML.

Based on past gathers at least 20% of the horses are likely to remain undetected due to the extensive cottonwood forests found on the State Park, thus evading capture attempts.

We do not have any specific data on foaling rates for the Lahontan HMA, however, it is felt that the Garfield Flat HMA, also with in this Field Office would reasonably reflect the Lahontan rates.

Table 5. Foaling Rates. Proportion of males is 0.58%

| Age Class | Foaling Rate |
|-----------------|--------------|
| Foal | 0 |
| 1 | 0 |
| 2 | 0.52 |
| 3 | 0.67 |
| 4 | 0.76 |
| 5 | 0.89 |
| 6 | 0.76 |
| 7 | 0.90 |
| 8 | 0.88 |
| 9 | 0.91 |
| 10-14 | 0.81 |
| 15-19 | 0.82 |
| 20 ⁺ | 0.75 |

These data were collected by M. Ashley and S. Jenkins at Garfield Flat, Nevada between 1993 and 1999. Marked females were followed for a total of 351 animal-years to generate these data on foaling rates.

We do not have any specific data on survival rates for the Lahontan HMA, however, it is felt that the Garfield Flat HMA, also in this Field Office would reasonably reflect the Lahontan rates.

Table 6. Age specific survival rates.

| Age Class | Females | Males |
|-----------------|---------|-------|
| Foal | 0.919 | 0.877 |
| 1 | 0.996 | 0.950 |
| 2 | 0.994 | 0.949 |
| 3 | 0.993 | 0.947 |
| 4 | 0.990 | 0.945 |
| 5 | 0.988 | 0.942 |
| 6 | 0.985 | 0.939 |
| 7 | 0.981 | 0.936 |
| 8 | 0.976 | 0.931 |
| 9 | 0.971 | 0.926 |
| 10-14 | 0.947 | 0.903 |
| 15-19 | 0.870 | 0.830 |
| 20 ⁺ | 0.591 | 0.564 |

These data were collected by M. Ashley and S. Jenkins at Garfield Flat, Nevada between 1993 and 1999. Marked individuals were followed for a total of 708 animal-years to generate these survival probabilities. All scenarios were run 100 times.

Proposed Action, would utilize removals, median growth rate of 21.3 percent and a median average size at the end of 12 with the highest trail having an ending population of 39 horses. Over the 20 year period only 37 horses were removed.

Table 7. Average growth rate in 20 years, removals.

| | |
|-----------------------------|-------|
| Lowest Trial | 2.3% |
| 10 th Percentile | 12.7% |
| 25 th Percentile | 16.7% |
| Median Trial | 21.3% |
| 75 th Percentile | 24.6% |
| 90 th Percentile | 28.2% |
| Highest Trial | 30.7% |

Table 8. Totals in 21 years, removals:

| | Gathered | Removed |
|-----------------------------|----------|---------|
| Lowest Trial | 23 | 16 |
| 10 th Percentile | 32 | 24 |
| 25 th Percentile | 45 | 32 |
| Median Trial | 51 | 37 |
| 75 th Percentile | 60 | 46 |
| 90 th Percentile | 70 | 54 |
| Highest Trial | 91 | 69 |

Alternative 1 would utilize removals techniques to control the population, with the population only being reduced to the upper end of the AML. This resulted in a median growth rate of 16.9 percent and a median average size at the end of 14 with the highest trail having an ending population of 32 horses. Over the 20 year period 42 horses were removed (median trial).

Table 10. Average growth rate in 20 years, removals. However, the population was only reduced to the upper AML.

| | |
|-----------------------------|-------|
| Lowest Trial | -.09% |
| 10 th Percentile | 9.8% |
| 25 th Percentile | 13.4% |
| Median Trial | 16.9% |
| 75 th Percentile | 20.9% |
| 90 th Percentile | 23.1% |
| Highest Trial | 26.9% |

Table 11. Totals in 21 years, removals only down to the upper AML.

| | Gathered | Removed |
|-----------------------------|----------|---------|
| Lowest Trial | 15 | 7 |
| 10 th Percentile | 35 | 26 |
| 25 th Percentile | 46 | 34 |
| Median Trial | 59 | 42 |
| 75 th Percentile | 74 | 52 |
| 90 th Percentile | 84 | 61 |
| Highest Trial | 92 | 68 |

Table 12. Population size in 21 years, removals only to the upper AML.

| | Minimum | Average | Minimum |
|-----------------------------|---------|---------|---------|
| Lowest Trial | 2 | 10 | 15 |
| 10 th Percentile | 6 | 12 | 18 |
| 25 th Percentile | 7 | 13 | 20 |
| Median Trial | 9 | 14 | 22 |
| 75 th Percentile | 10 | 15 | 24 |
| 90 th Percentile | 10 | 16 | 28 |
| Highest Trial | 12 | 18 | 32 |

The No Action Alternative would leave the population to its own device (no management) and resulted in a median growth rate of 20.1 percent and a median size at the end of 21 years of 2,498 with the highest trail having an ending population of 16,568 horses. Of course well before the population reaches these magnitudes the habitat would be destroyed, most wildlife and native plants would have been extirpated, noxious non-native weeds would dominate, livestock could no longer be produced and the horses themselves would likely also be extirpated. However, we have provided the results below for academic interest.

Table 22. Average growth rate in 20 years, no management, No Action Alternative.

| | |
|-----------------------------|-------|
| Lowest Trial | 15.8% |
| 10 th Percentile | 18.2% |
| 25 th Percentile | 19.1% |
| Median Trial | 20.1% |
| 75 th Percentile | 21.1% |
| 90 th Percentile | 22.0% |
| Highest Trial | 23.1% |

Table 23. Population sizes in 21 years, no management, No Action Alternative.

| | Minimum | Average | Maximum |
|-----------------------------|---------|---------|---------|
| Lowest Trial | 193 | 1,205 | 3,775 |
| 10 th Percentile | 205 | 1,897 | 6,377 |
| 25 th Percentile | 208 | 2,167 | 7,595 |
| Median Trial | 220 | 2,498 | 8,682 |
| 75 th Percentile | 230 | 2,804 | 10,231 |
| 90 th Percentile | 244 | 3,071 | 11,736 |
| Highest Trial | 309 | 4,059 | 16,568 |

Unavoidable impacts in the form of injuries to the horses may occur during the removal process. Based on past gathers death loss is not expected to exceed 1% of the horses captured at the trap site. 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.

Appendix 3, Removal Procedures

I. Methods for Removal and Safety

The methods employed during this capture operation would 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) would be supervising the contractor at all times during the gathering operation. The following stipulations and procedures would 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 would 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) would 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 would select the general location of trap sites in which to herd the animals. Animal concentration, terrain, physical barriers and weather conditions would 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 would 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 would 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 would be considered in making this determination. Horses shipped from the temporary holding corral to the BLM facility would 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 would 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 would 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 would 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 would be made as the horses are transported along dirt roads. If speed restrictions are placed in effect, then BLM employees would, 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 would remain together. Foals shall not be left behind.

To avoid adverse impacts to water quality and riparian areas trap sites will be located in upland situations, along existing roads. Because trap sites are located along existing roads threatened, endangered, sensitive or special status plant species are not likely to be impacted, however, these sites will be surveyed and if threatened, endangered, sensitive or special status plant species are present another location will be selected for a trap site.

The CCFO 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 would be checked soon after capture to determine if they are nursing. If nursing mares are captured without foals intensive monitoring would be conducted to identify the reason(s) foals are being abandoned and a solution would be developed. The health and well being of the captured animals are paramount and foals would not be left behind.

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

BLM would not allow horses to be herded more than 12 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 would also be considered in making distance and speed restrictions.

Special attention would 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 2 trap locations would 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 would 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 tentative trap sites (Map 1) are not located near enough to the concentrations of horses, then the trap site would not be approved. The COR/PI would move the general location of the trap closer to the horses. Trap sites would be located outside of the WSA. Trap sites would 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 would 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 would 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 would 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 would 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 a.m. and 4:00 p.m.

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 would 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. When refueling, the helicopter shall remain a distance of at least 1,000 feet or more from animals, vehicles (other than fuel truck), and personnel not involved in refueling.

13. Mares and foals would be paired up soon after capture and separated from other adult horses. Mares that are within the target age group for removal would 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, would be weaned and shipped to PVC. While holding animals at temporary corrals every effort would be made to pair up mares with foals. Any foals that do

not pair up with a mare would be shipped to PVC.

14. Foals of older mares which are too young to wean would be released back into the HMA with their mare. In order to minimize stress to the foals, older mares and their foals would 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 would be to maximize the period of time between releasing small foals and other animals. Also, mares with foals would be released in small groups to minimize the likelihood of the adult horses running off too quickly for the foals to keep up.

15. Following the release of animals from corrals or trailers, the area surrounding the release site would 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 would be sent to Palomino Valley Wild Horse and Burro Placement Center to be processed for adoption.

Impounded, privately owned animals would 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 Field Office Managers are 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 CCFO and/or BMFO, would be on site. Also, the Assistant Field Managers and Field Managers 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 Field Office Managers, Assistant Field Office Managers, COR and PIs.

The COR and/or PI would constantly, through observation, evaluate the contractor's ability to perform the required work in accordance with the contract stipulations. Compliance with the contract stipulations would 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 would 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 would evaluate the conditions which may cause undue stress to the animals. The factors considered would 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 would 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.

VII. Finding of No Significant Impact and Decision Record

Decision: Implement the Lahontan HMAP and Capture Plan Update as identified in the Proposed Action and using the Procedures detailed in Appendix 3. The subject plan directs management actions for the Lahontan HMA. 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, removing excess wild horses and maintaining and improving riparian areas. 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.

Rational for decision: The Carson City Consolidated 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 7 and 10 individuals the vegetation utilization levels would be maintained at sustainable levels ($\leq 55\%$ use). This action is not significant because a population of wild horses would be maintained within the HMA and the vegetation, wildlife and livestock would not be adversely impacted.

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.

The decision to implement the Lahontan HMAP and Capture Plan Update is in conformance with the Carson City Field Office Consolidated Resource Management Plan, and would restore the range to a thriving ecological balance and prevent a deterioration of the range, as analyzed in the subject EA, 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 would result in reduced soil erosion and improve the physical condition of wild horses.

The proposed actions would not adversely impact air quality, ACECs, cultural resources, farmlands, floodplains, Native American religious concerns, T&E species, wastes, water quality, wetlands and riparian zones, wild and scenic rivers, migratory birds or wildernesses.

The capture portion of this plan is issued Full Force and Effect to allow for the immediate removal of excess wild horses from the Lahontan HMA to reach the established Appropriate Management Level (AML). Immediate removal of wild horses in excess of the AML is necessary to restore the range to a thriving natural ecological balance and to avert the imminent overgrazing caused by excess wild horses within the HMA. The Full Force and Effect determination is in accordance with the regulation at 43 CFR 4770.3(c).

Within 30 days of receipt of this decision, you have the right of appeal to the Board of Land Appeals, Office of the Secretary, in accordance with the regulations at 43 CFR, Part 4, Subpart E. If an appeal is taken, you must follow the procedures outlined in the enclosed form 1842-1, Information of Taking Appeals to the Board of Land Appeals. Within 30 days after you appeal, you are required to provide a Statement of Reasons to the Board of Land Appeals and a copy to the Regional Solicitor's Office listed in Item 3 on Form 1842-1. Please provide this office with a copy of your Statement of Reasons. Copies of your Appeal and the Statement of Reasons must also be served upon any parties adversely affected by this decision the Appellant has the burden of showing that the decision appealed from is in error.

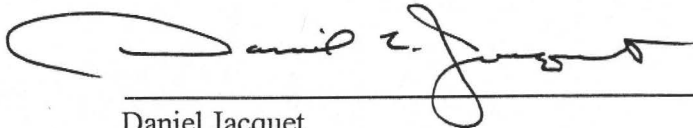
If the appellant wishes to file a petition (request) (pursuant to 43 CFR 4.21) for a Stay (suspension) of the effectiveness of this Decision during the time that the appeal is being reviewed by the Interior Board of Land Appeals, the Petition for Stay must accompany the Notice of Appeal. A petition for a Stay is required to show sufficient justification based on the standards for obtaining a Stay. Copies of the Notice of Appeal and Petition for a Stay must also be submitted to the appropriate Office of the Solicitor (see 43 CFR 4.413). If the appellant requests a Stay, the appellant has the burden of proof to demonstrate that a Stay should be granted.

Standards for Obtaining a Stay

Except as otherwise provided by law or by other pertinent regulation, a Petition for a Stay of a Decision pending appeal shall show sufficient justification based on the following standards:

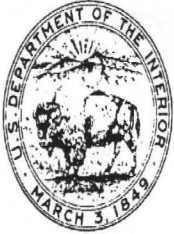
1. The relative harm to the parties if the stay is granted or denied,
2. The likelihood of the appellant's success on the merits,
3. The likelihood of immediate and irreparable harm if the stay is not granted, and
4. Whether the public interest favors granting the stay.

Approved by:



Daniel Jacquet
Assistant Manager, Renewable Resources
Carson City Field Office

1/5/04
Date



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Carson City Field Office
5665 Morgan Mill Rd.
Carson City, NV 89701
(775) 885-6000

In Reply Refer To:
4120 CF
(NV-03200)

NOV 03 2003

Dear Interested Public:

In your response to our letter dated January 27, 2003, you stated an interest in the planning of range improvement projects on certain allotments in the Carson City Field Office. The proposed range improvements projects discussed below are included within one of these allotments.

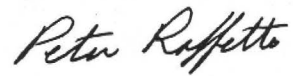
No threatened, endangered, state sensitive or candidate plant or animal species are known to exist in the vicinity of any of these projects. None of the projects are located within a wild horse or burro herd management area, wilderness study area, and Area of Critical Environmental Concern (ACEC) is nearby.

A. Spanish Spring Fence: (RI-031)

The proposed project will be located within two miles southeast of Spanish Springs, in Washoe County, Nevada (Figure 1). The proposed project will be an 800' fence and cattleguard next to an existing road. The proposed site is located in Spanish Springs/Mustang Allotment. The area of disturbance will be approximately 1.0 acre. This project would control the movement, timing and removal of the permittees cattle and would improve livestock distribution within areas of the allotment not currently being used. The fence will stop cattle from moving into the City of Sparks area.

If you wish a copy of the upcoming environmental assessment, proposed decisions or final decisions, please reply in writing by November 18, 2003. Please state the project you are interested in and any specific concerns related to the project.

Sincerely,



Peter Raffetto
Rangeland Management Specialist
Renewable Resources
Carson City Field Office

Spanish Springs/Mustang Allotment

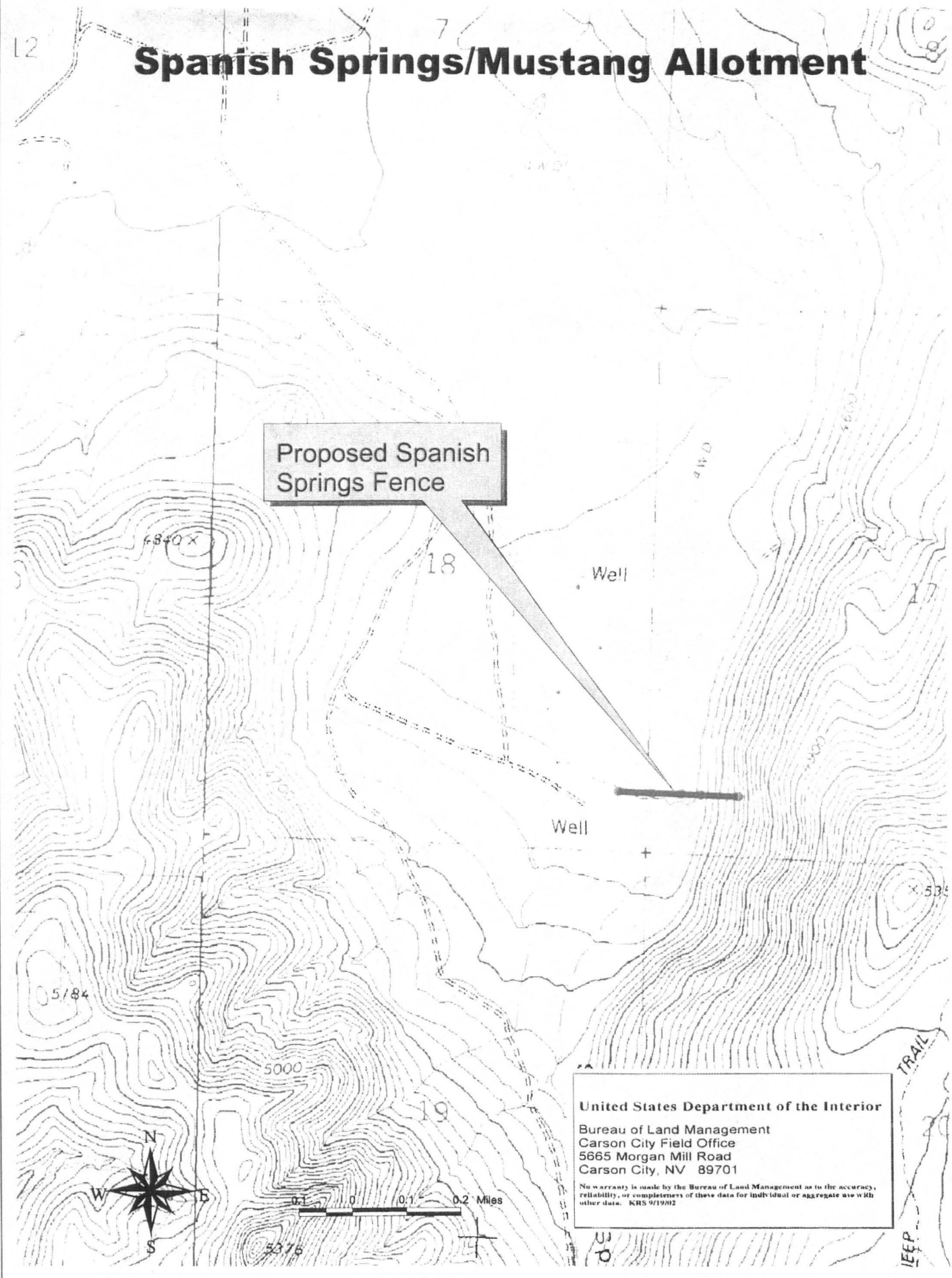
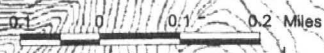
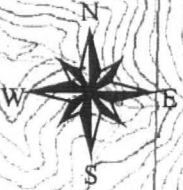
Proposed Spanish Springs Fence

Well

Well

United States Department of the Interior
Bureau of Land Management
Carson City Field Office
5665 Morgan Mill Road
Carson City, NV 89701

No warranty is made by the Bureau of Land Management as to the accuracy, reliability, or completeness of these data for individual or aggregate use with other data. KRS 9/19/02





DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES
COMMISSION FOR THE
PRESERVATION OF WILD HORSES
885 Eastlake Boulevard
Carson City, Nevada 89704
Phone (775) 849-3625 • Fax (775) 849-2391

December 1, 2003

Dan Jacquet, Assistant Manager
BLM-Carson City Field Office
5665 Morgan Mill Road
Carson City, Nevada 89701

RE: E2004-078 Lahontan Wild Horse Gather/EA

Dear Dan,

Thank you for the opportunity to review and comment on the Lahontan HMA Plan/Capture Plan/EA Update.

As in our previous comments and discussions on this area we have discussed our concerns for management of an area with such a low AML which is not genetically viable. We have always opposed "transplanting" of horses from one area to another and feel this practice is not consistent with the 1971 Wild Horse and Burro Act mandating minimal feasible management.

This is a very secluded HMA with distinctive horses. By reducing the number between 7-10 horses and then augmenting the herd by transplanting other horses, we feel you are trying to establish a "token" herd that is not viable and needs intensive management to maintain its viability. As we see in your documents, page 37, you do not have specific data on foaling and survival rates. How can you propose genetic management for this population, when in over 30 years your gather data should also show your recruitment rates but that has not been analyzed and presented? Provisions of the wild horse and burro act require herds to be independently managed for their unique characteristics, which again, we feel augmenting the HMA with outside horses violates the intent of the Act.

Dan Jacquet, Assistant Manager
December 1, 2003
Page 2

The AML was determined in 1993 with less than four years of use pattern-mapping data. Scheduled gathers were not conducted and present numbers are 20 times greater than the appropriate management level. It is my understanding that there is no available water inside the HMA boundary. Please correct me if I am wrong. This would support the argument that the HMA boundary lines were drawn incorrectly back in the early years of the program. The Act requires that water be a component of an HMA.

No new data has been provided to either support or deny the 10 year old AML established in 1993. We question if extensive research was implemented to determine the 1971 area of use, where those boundaries would actually lie and what the actual AML would be based on those new boundaries.

None-the-less, recent research suggests that a minimum gene pool for a viable population is 75 breeding animals which would need an AML of up to 150 horses overall. We are opposed to managing for an AML of 7-10 horses with augmentation from outside. We question the long term survivability and appropriateness of trying to manage for this impossible situation.

Issues raised in the past by state agencies have included conflicts with the Division of State Parks lands at Lahontan State Park. It was recommended that the appropriate management level was far below a genetic viable herd and land conflicts did not provide habitat for this herd. We question the long term survivability and appropriateness of trying to manage for this low an AML and that by "mixing" in other horses, you are violating the intent of the Act as well as diluting the unique gene pool already there.

Other HMA's have been closed out over time due to land, population growth, and checkerboard land conflicts. We would suggest a completely new evaluation which should either show that boundaries are incorrect and that the new HMA (based on census data from the early 70's) would support a viable population or that it will not (as required under the Act) and that this area is not appropriate for management of wild horses.

If you have any questions, please feel free to contact me.

Sincerely,


CATHERINE BARCOMB
Administrator