

W H O A

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



... a note from

Dawn Y. Lappin

July 24, 1995

Mr. John Matthiessen
Walker Resource Area Manager
Bureau of Land Manager
1535 Hot Springs Road
Carson City, Nevada 89701

Subject: Protest to Pine Nut Herd Management Area Wild Horse
Management Decision

Dear Mr. Matthiessen:

WHOA formally protests the proposed decision for the Pine Nut Wild Horse Herd. Our detailed comments concerning the criteria and procedures to determine the appropriate management level were not answered to our satisfaction. We wish the following errors be fully addressed in the final decision:

Procedures and data use did not establish an appropriate management level that will result in a thriving natural ecological balance as required by the Wild Horse and Burro Act.

All allotment evaluations use one alternative of the Technical Manual 4400-7 that determined potential stocking rates for livestock and wild horses. Use of any alternative that allows for weight averaging use pattern mapping data assumes that even distribution of grazers will be accomplished throughout the allotment. Conclusions of these allotment evaluations found that even distribution cannot be achieved.

Monitoring data failed to distinguish livestock, wildlife and wild horse use of forage species. Some allotment evaluations exhibited just domestic sheep and wild horse use, others exhibited cattle and wild horse use; while, others exhibited just wild horse use. The District selectively chose mixed data and arbitrarily applied this data to determine the appropriate management level. These

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specific data points should have been used to present the best and most available data for the proposed decision.

Federal regulations do not clearly define a wild horse animal unit month. A definition is available from another Nevada land use plan that defines one AUM is equal to an adult horse for one month. No data was presented to explain the survey month, survival rate or population estimates that included foals as wild horse use in computations.

Implementing the necessary adjustments to livestock and wild horses will not achieve the area's carrying capacity. Out dated federal regulations and policies allowing for five year adjustments and phased reductions of wild horses will continue to degrade wild horse habitat. How will the District meet carrying capacity as required by Federal Regulation with the above phased in periods?

RELIEF

WHOA supports the management of wild horses to achieve healthy rangelands and ecosystems. As a fundamental of the Wild Horse and Burro Act, the Bureau must achieve a thriving natural ecological balance by adjusting uses to meet the needs of the natural resources of public lands. As stated in our comments to the allotment evaluations and this protest, the appropriate management level for the Pine Nut Wild Horse Herd is flawed based upon unfounded assumptions regarding livestock. Cattle, domestic sheep and wild horses do not use the range in the same manner. Therefore, the use of wild horse use pattern mapping data cannot be made to determine a change in livestock classification or adjustment in season of use. In many situations the protection of riparian habitat cannot be assured without fencing. Assumptions that the continuation of current livestock management, changes in livestock classification or completing future fence projects to mitigate the adverse affects of grazing are incorrect, due to the monitoring data of the allotment evaluations and future agency funding for range projects.

We encourage the District to revise its carrying capacity determinations and allocate forage to meet all allotment objectives to achieve a thriving natural ecological balance.

Sincerely,

Dawn Lappin

DAWN LAPPIN
Director

by CAB