



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

CARSON CITY DISTRICT OFFICE

1535 Hot Springs Rd., Ste. 300

Carson City, NV 89706-0638

M 9/12/90
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IN REPLY REFER TO:

4130CF
NV03480

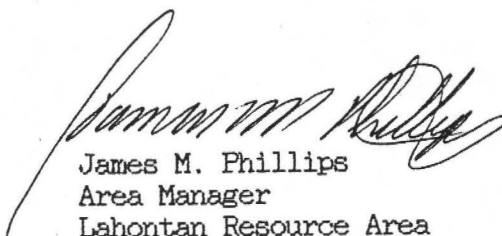
SEP 12 1990

Dear Reviewer:

Enclosed you will find a copy of the completed Lahontan Allotment Evaluation for your review and comments. The review period will be 30 days beginning with the date of this letter.

Your comments will be considered in the finalization of this document. Thank you for your interest and input into our Evaluation.

Sincerely yours,


James M. Phillips
Area Manager
Lahontan Resource Area

Enclosure
Allotment Evaluation

Jim Geaxola;
Jerry Knight - any waters

Art Wolfe

ALLOTMENT EVALUATION SUMMARY

I. INTRODUCTION

- A. Allotment Name & Number : Lahontan -- 3036
- B. Permittees : Harriman and Son; Kent Bros; Casino West.
- C. Evaluation Period 1982-1989
- D. Selective Management Category & Priority : M, no priority assigned

II. Initial Stocking Level

A. Livestock Use

1. Adjudicated AUMs

a. Total Preference

1,155 Animal Unit Months (AUMs) cattle

Harriman and Son 375 AUMs.

Kent Bros. -- No preference, EOU only (75 AUMs when authorized).

Casino West -- 780 AUMs.

b. Suspended

0

c. Active

1,155 cattle

d. Exchange of use (Kent Bros.)

75 AUMs

2. Season of Use

November 1 to March 31.

3. Kind and Class of Livestock

Cow/Calf.

4. Percent Federal Range/Exchange of Use

100% Federal Range/75 AUMs

B. Wild Horse and Burro Use

1. Population :

The entire Lahontan Herd Management Area (HMA) is within the Allotment, the HMA comprises 21% of the Allotment. There are no wild

burros within the allotment. Approximately 185 head (2,220 AUMs) of wild horses use is currently occurring within the allotment.

2. Herd Management Area :

The wild horse population has expanded far beyond the HMAs capacity to provide habitat. This has lead to an average of 86 percent of the wild horses using areas of the allotment outside of the HMA.

C. Wildlife Use

1. Species : Mule Deer

2. Key or Critical Management Areas : None

III. Allotment Profile

A. Description

Lahontan Allotment is in the Fort Churchill Planning Unit, approximately 8 miles south west of Fallon, NV. Elevations vary from 4,000 to 5,500 feet (Map 1).

B. Acreage

1. Total : 77,220 acres

2. Pastures : none

C. Allotment Specific Objectives (Lahontan Resource Management Plan & Final EIS Nov. 8, 1984)

1. Land Use Plan (LUP) Objectives

a. Short Term :

Develop AMPs/grazing systems on Category I allotments and grazing systems as needed on Category M and C allotments to improve condition, provide for proper utilization within key areas, achieve better livestock distribution to obtain more uniform utilization, and provide an increase in available forage and water for livestock, wild horses, and wildlife.

Continue existing rangeland monitoring studies, and establish new studies as recommended by the 1981 Nevada Range Monitoring Procedures, to determine if management objectives are being reached and what adjustments in livestock use, wildlife reasonable numbers, and wild horse numbers are necessary.

When reasonable numbers of mule deer are attained, these numbers may be adjusted based on joint monitoring studies by NDOW and BLM.

Conduct wild horse gatherings as necessary to initially maintain the herds at the current population of 2190 head (Planning Unit Wide; 42 head for Lahontan HMA).

Develop range improvements to protect and improve mule deer, sage grouse, bighorn sheep, fisheries and riparian habitat, and to improve livestock and wild horse distribution and vegetation utilization.

b. Long Term : In the long term, the range monitoring program would provide data on which to base future adjustments in livestock, wildlife reasonable numbers, and wild horse use, and to identify additional range improvements. All future adjustments and improvements would be designed to achieve the objectives of this alternative.

The initial assignment of allotments into the categories of "Maintain", "Improve", and "Custodial" will be evaluated periodically. These evaluations will assure that the management objectives are being reached and that AMPs and range improvements will be initiated for those allotments requiring more intensive management.

Providing forage for reasonable numbers (3201 AUMs; planning area wide) of big game would be a long term objective.

It is anticipated that additional habitat management plans will be prepared and implemented in the long term.

2. RPS Objectives (Lahontan RPS Update Dec. 1989)

a. Short Term

Utilization levels are not to exceed 55 percent on identified key species on upland key areas. Initially allow 1,155 AUMs of livestock use.

b. Long Term

1. Maintain existing ecological condition and trend.

2. Maintain or improve wild horse habitat consistent with wildlife and livestock objectives. Maintain or improve free roaming behavior of wild horses by protecting or enhancing wild horse home ranges. Maintain or improve wild horse habitat by assuring that all waters remain open to use by wild horses. Initially provide approximately 504 AUMs of forage for approximately 42 head of wild horses.

3. Activity Plan Objectives : No activity plan has been scheduled for this "M" category allotment. However, specific objectives have been refined for key management areas on the allotment.

a. Short Term

Allow no more than 55% utilization of Indian ricegrass (Oryzopsis hymanoides; (Orhy), Needle and threadgrass (Stipa comata; Stco) and 45% on winter fat (Eurotia lanata; (Eula).

b. Long Term

If short term utilization objectives are met long term RPS objectives will also be met.

4. Threatened and Endangered species (T & E) : There are no known T & E plants within the allotment. Wintering bald eagles, an endangered species, utilize cottonwood trees on lands adjacent to BLM administered land administered by the State Parks Department.

D. Key Species Identification

1. Upland:

Indian ricegrass
Needle and threadgrass
Winter fat
Bottlebrush squirreltail
Spiny hopsage

Sitanion hystrix (Sihy)
Tetradymia spinosa (Tesp)

2. Riparian Areas: None

IV. Management Evaluation

A. Purpose

The purpose of this evaluation is to summarize the base data to determine whether or not Activity Plan Objectives are being met. Further base data will aid in making technical recommendations for those objectives which are not being met and to provide a basis for making any future decisions regarding authorized use.

B. Summary of Studies Data

1. Actual Use

Livestock use is from November 1 through March 31, wild horse use is yearlong (see table 1).

Table 1. Actual Use/ Annual Precipitation

Yr.	AUMs	AUMs	% Horse use, AUMs	Total AUMs	% Use	Annual Precipitation
	Actual Use Cattle	Actual Use Wild Horse				
76	1,984	144*	07%	2,128	61%	3.99"
77	1,787	180*	09%	1,967	60%	4.95"
78	2,375	228*	11%	2,603	46%	6.85"
79	2,775	288*	09%	3,063	28%	7.06"
80	2,800	360*	11%	3,160	63%	5.76"
81	1,236	444*	26%	1,680	25%	4.22"
82	1,323	504	28%	1,827	21%	8.73"
83	1,550	665*	30%	2,215	23%	10.92"
84	1,354	878*	39%	2,232	28%	4.57"
85	1,573	1,159*	42%	2,732	40%	6.10"
86	1,504	1,560	51%	3,064		4.19"
87	473	1,716	92%	2,139	17%	4.23"
88	75	2,064	96%	2,139		3.15
89	75	2,220	97%	2,295	47%	

wild horse numbers were obtained by aerial censuses.
* estimated.

2. Wild Horse & Burro:

As indicated above wild horse use has increased from 504 AUMs in 1982 to 2,220 AUMs in 1989, with 86% being made outside of the HMA.

3. Precipitation

The closest weather station is at the Lahontan dam, which is located at the north edge of the allotment. Precipitation data is collected by the National Oceanic and Atmospheric Administration and is provided by the Western Region Climate Center (table 1).

4. Utilization

a. Key Area : Utilization is read on the key area yearly.

b. Use Pattern Mapping:

The 1989 use pattern map showed that 63% of the allotment is receiving slight, light or moderate use, 26% of the allotment is receiving heavy use and that 11% of the allotment is receiving severe use (use pattern map, attached). All of the heavy and severe use is attributed to wild horses.

5. Trend

One Key area frequency transect was established in 1984 and is read on three year intervals. There are also 6 photo trend plots, which are read on five year intervals.

Many mature Indian ricegrass plants are dying and are failing to reproduce in the heavy and severe use areas, which is indicative of a downward trend. The reason for this is the continual over use by wild horses year round on the Lahontan allotment. Utilization of 25% or more of current years growth during April and May is detrimental to Indian ricegrass (Cook & Harris, 1968). Based on visual observation the trend is declining. Because of the wild horses utilization of the allotment year round the Indian ricegrass plants cannot produce sufficient seeds or establish young plants required to produce an upward trend.

Even with reduced livestock numbers (cattle) during the past three years on the allotment conditions have not improved. This is due to the continual use by wild horses year round on key species. The resulting utilization occurred because the increased number of wild horse within the herd area has forced wild horses to leave the herd area in search of forage outside the herd area. This has resulted in the wild horses taking 47 percent of the available forage outside the herd area (1989 data).

6. Range Survey Data :

7. Ecological Condition :

<u>Early Seral</u>	<u>Mid Seral</u>	<u>Late Seral</u>	<u>Potential Natural Community</u>
14%	54%	32%	< 1%
6,791 acres	26,053 acres	14,763 acres	342 acres

The data for ecological status was collected in 1982.

8. Wildlife Habitat : Habitat is also being adversely affected by over utilization of the allotment from wild horses. Over utilization of the grasses is occurring in and around the HMA. This is causing a decrease of desirable grass species.

9. Riparian/Fisheries Habitat: None within the Allotment.

10. Wild Horse Habitat :

Habitat is currently receiving heavy and severe use in and around the HMA. This is due to the wild horse population increase and utilization far exceeding the HMA's capacity to produce forage for the current number of wild horses. This in turn has lead to the wild horses over utilizing many areas outside of the HMA.

C. Allotment Objectives

1. LUP

a. Short Term
see RPS

b. Long Term
see RPS

2. RPS

a. Short Term :

Objectives are not being met. Utilization in excess of 55% is occurring on key species (Indian ricegrass, needle and threadgrass and bottlebrush squirrel tail) in the western third of the allotment. Wild horse numbers have not been adjusted as necessary and this has resulted in over 2000 AUMs of wild horse use per year on the allotment. Livestock use has been reduced to 75 AUMs or 7 percent of the active preference of 1155 AUMs, due entirely to lack of forage.

b. Long Term :

Since the short term objectives (of limiting utilization to 55 percent) is not being met, it is doubtful the long term objectives can be met. Ecological condition will not be maintained with the current use which is in excess of 55 percent on the western half of the allotment. The rangeland condition and production has not improved.

If utilization is not decreased to 55% or less, ecological condition and trend will not be maintained or improved. Trend is expected to go down and ecological condition would deteriorate.

3. Activity Plan

a. Short Term

Objectives are not being met. Utilization (from wild horses) in excess of 55% is occurring on key species (Indian ricegrass, needle and threadgrass, and bottlebrush squirrel tail) on the western half of the allotment.

b. Long Term

Ecological condition will not be maintained with current use.

4. T&E Species

Currently the over utilization does not appear to be adversely impacting the bald eagles roosting sites, however, it is not known to

what degree the use is impacting prey species (fish and waterfowl on State Park administered land).

V. Conclusions

Actual use; figures indicate an increase in wild horse numbers and AUMs used each year and a decrease in cattle numbers during the past seven years. This has resulted in degraded conditions as 79% of the HMA is in the heavy to severe use class. Within the HMA vegetation such as Indian ricegrass plants are being pulled out by the roots. Plants are stressed due to severe use and dry conditions.

During 1988 and 1989 most of the 75 AUMs used by cattle within the Lahontan allotment were grazed on private lands. The over all weighted average utilization read on key grass species in 1989 was 47%. This use is attributed solely to wild horse use.

Livestock Utilization: as shown in Table 1 has been declining since 1976 with drastic reductions since 1986. The non-use taken by the permittees has been based on their concern for the range conditions, with the ever growing numbers of wild horses which have been increasing since 1976. Because of the distance of the key area from natural water sources (4 miles), utilization in the key area has not increased correspondingly with the increase in wild horse numbers, while the HMA and surrounding areas has been overgrazed. When livestock are on the allotment water is pumped into troughs several miles from the key area. The horses have been forced to forage in areas outside the HMA. Most of the utilization occurring in the last three years has been by wild horses. No use of the key area was made by cattle for the last two years based on lack of cattle sign. The cattle use was Exchange Of Use (EOU) made on the north side of the allotment, at least 8 miles from the key area.

The vegetation on this allotment is not suitable for year round grazing. Because of this the allotment was not adjudicated yearlong. Wild horses must rely on the limited vegetation year round. Using the existing grasses while they are growing, limits or prevents production of seed and storage of nutrients essential for the plant vigor, survival and reproduction. To maintain or improve this situation rest for plants must be provided during the growing months.

Presently the western 1/3 of allotment is used heavily by wild horses, without any control of numbers, or limits to the amount of forage they consume. This is resulting in low seed production, loss of surface litter and recently the removal of plants. We cannot meet management objectives on the allotment with present management of the wild horse habitat.

The maximum number of horses that the land will support should be determined to assure proper rangeland management within the HMA. The level at which the horses will survive with proper utilization of the forage grass species needs to be determined. This level is dependent upon their habitat limitations. In this HMA forage is limiting due to past overuse.

To maintain and improve the allotment and the HMA we must maintain or improve

ecological site 27-09, particularly the Indian ricegrass component. To do this we must reduce the loss of grass plants by decreasing grazing pressure. What is needed is occasional yearlong rest and less grazing intensity especially during the spring. This would improve and promote plant vigor and seed production, plus reestablish plant populations by providing for root storage of essential nutrients and energy.

Although livestock have not used this Allotment for the past 2 years (excluding the 75 AUMs of EOU) it is believed that when the wild horses are removed from areas outside of the HMA and adjusted within the HMA, that adequate forage will be available to meet the requirement of 1,155 AUMs of livestock use and still maintain the utilization at 55% or less. However, monitoring should continue on a yearly basis with another analysis and evaluation being completed in 1993 to insure that utilization does not exceed 55%. Further adjustment in AUMs, either increases or decreases will be based on this data (to be collected from 1990 - 1993) and implemented by 1994.

VI. Technical Recommendations

On Nevada ranges both research and evaluation studies show the key to rangeland improvement lies in the amount of rest provided the vegetation by deferment of grazing use during the growing season. The rate of improvement appears to be related to frequency and duration of rest. To improve the HMA area it is recommended to:

1. Adjust stocking rate, reduce wild horse numbers so that vegetation will be available within the HMA yearlong. This will require removal of all wild horses that range outside of the HMA and reducing the wild horse population within the HMA to an average of 10 (Appendix 1).
2. Maintain utilization levels at 55% or less on identified upland key species. Continue with monitoring and re-evaluate the Lahontan Allotment in 1993.
3. Remove all wild horse from areas outside of the HMA.
4. Grazing use needs to be altered in areas of the Allotment receiving heavy and severe use from wild horses. Cattle use should be altered by requiring the permittee to selectively pump the existing wells and haul water. However, the areas in heavy and severe use will not recover until the wild horses are removed from areas outside of the HMA and reduced to appropriate levels within the HMA.

VII. Literature Cited

Cook & Harris 1968. Nutritive Value of Seasonal Ranges. Utah Agr. Exp. Sta. Bul. 472.

Signature Page

Appendix 1.

From utilization records the average utilization within the HMA from 1989 is:

Category	Acres	% Use	% of HMA**	AUMs***	Available AUMs To Maintain 55% Use
Alkali Flat	2,096				
Slight*	0				
Light*	0				
Moderate	2,096	55 %	23%	69	69
Heavy	5,073	68%	56%	168	$\frac{168}{68} = \frac{x}{55} = 136 @$
Severe	<u>1,765</u>	84 %	20%	60	$\frac{60}{84} = \frac{x}{55} = \frac{39}{@@}$
Total	11,029			297	244

* There are no acres of slight or light use within the HMA.

** Percent of acres with forage

*** Based on percentage of available HMA acres and an average of 3 census conducted in 1988-89.

Using the accepted formula for making grazing animal adjustments it is determined that 15 wild horses need to be removed from the HMA.

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

$$\frac{168}{68\%} = \frac{x}{55\%} = 136 \text{ total AUMs in the area of heavy use}$$

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

$$\frac{60}{84\%} = \frac{x}{55\%} = 39 \text{ total AUMs in the area of severe use}$$

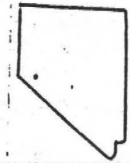
Thus a total of 244 AUMs of grazing use is available within the HMA to maintain the vegetation in a healthy state. Dividing the available AUMs equally between wild horses and livestock results in 122 AUMs for wild horses and 122 AUMs for livestock.

Dividing the 122 AUMs of horse use results in 10 horses year round.

The above formula works in areas where range conditions are satisfactory, however when the vegetative use is in heavy and severe use categories the above formula will over estimate the available AUMs which will bring about an improvement in vegetative condition. Therefore, a reduction in AUMs below what is indicated by the formula may be needed to bring about recovery of the vegetative condition.

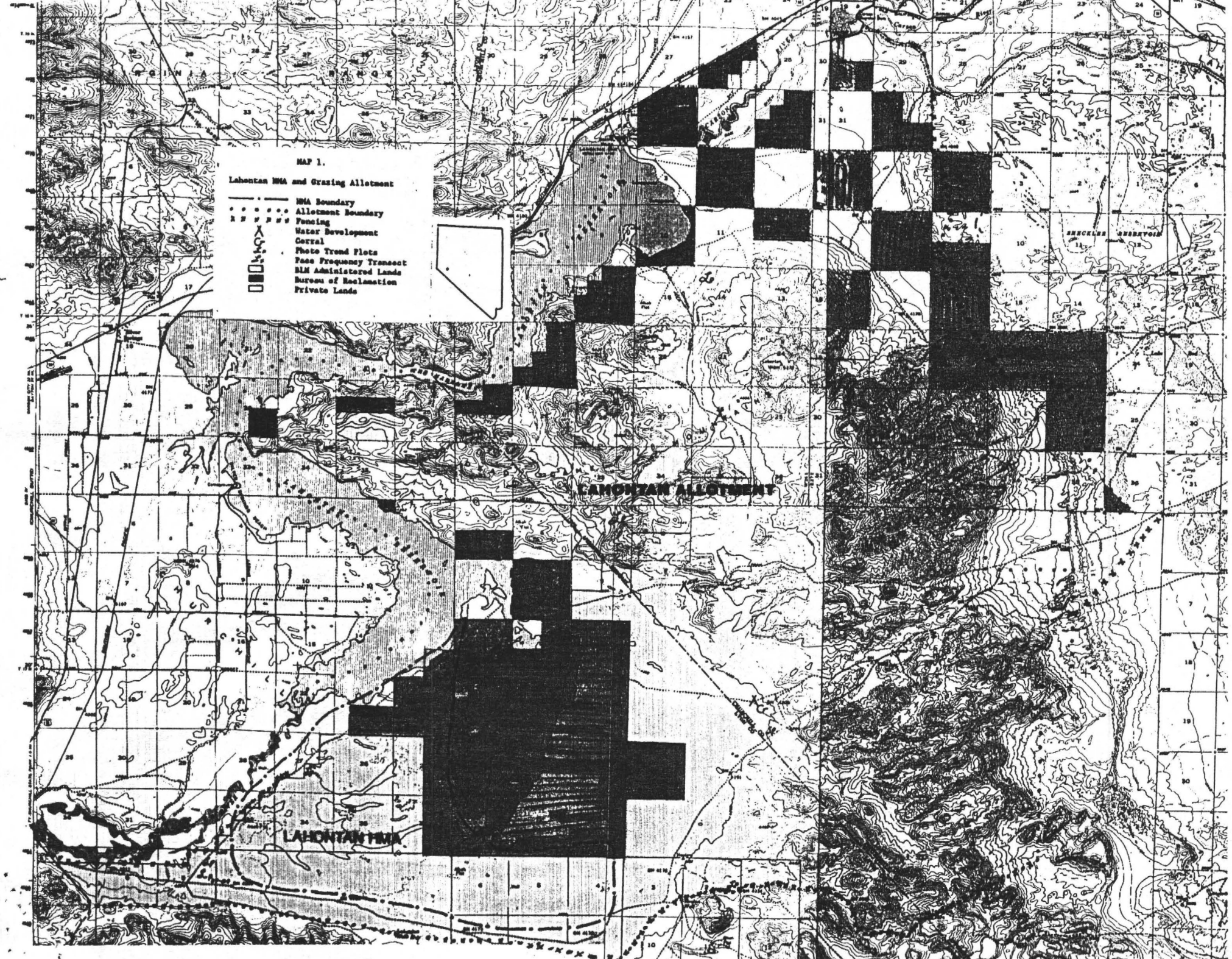
MAP 1.
 Lahontan NMA and Grazing Allotment

- NMA Boundary
- · · · · Allotment Boundary
- · · · · Fencing
- Water Development
- Corral
- Photo Trend Flots
- Fence Frequency Transect
- BLM Administered Lands
- Bureau of Reclamation
- Private Lands



LAHONTAN ALLOTMENT

LAHONTAN NMA

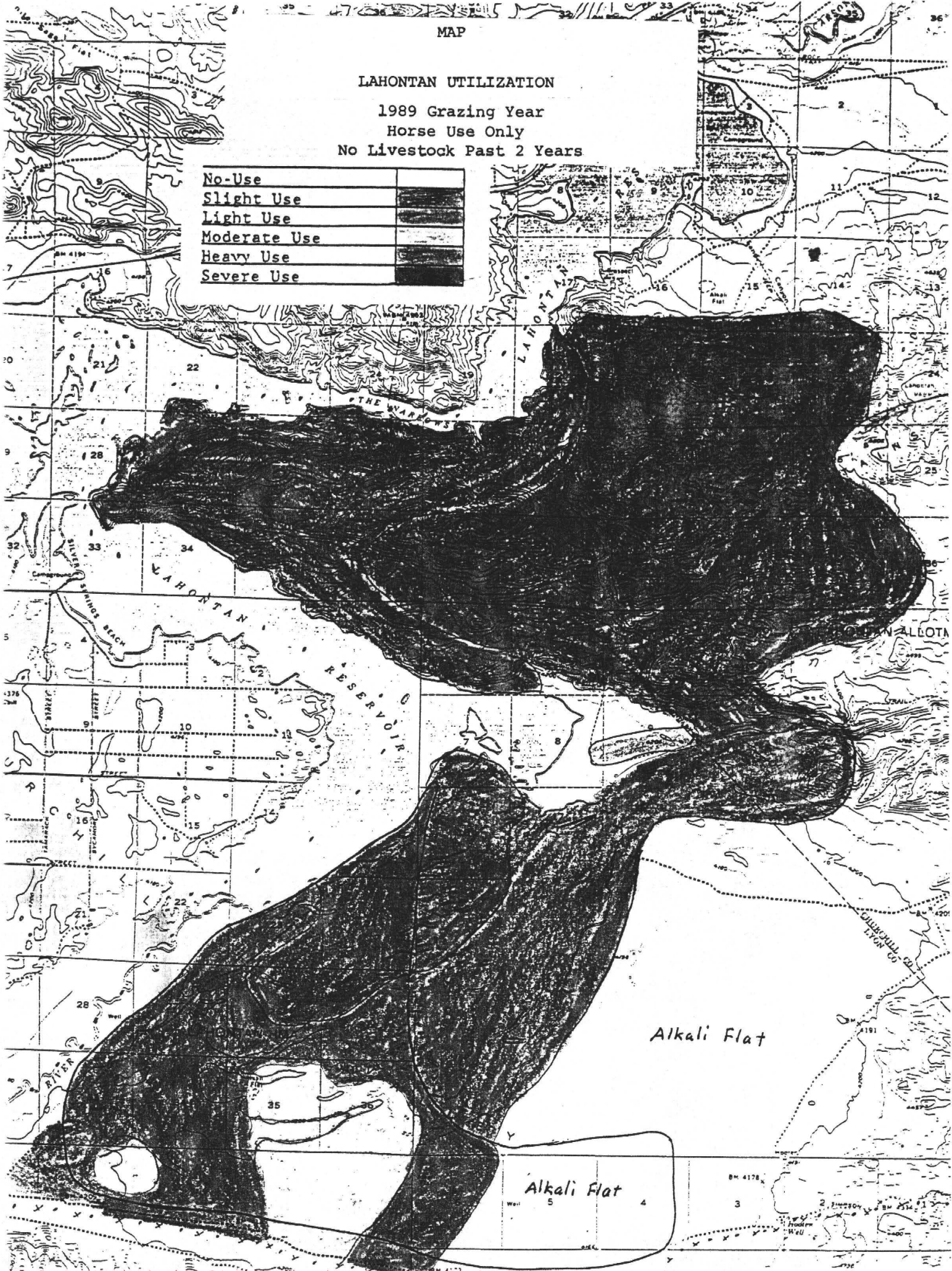


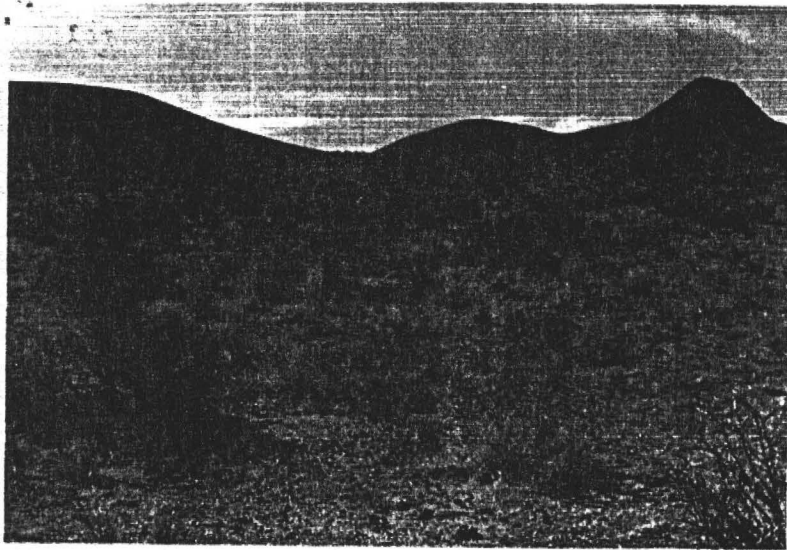
MAP

LAHONTAN UTILIZATION

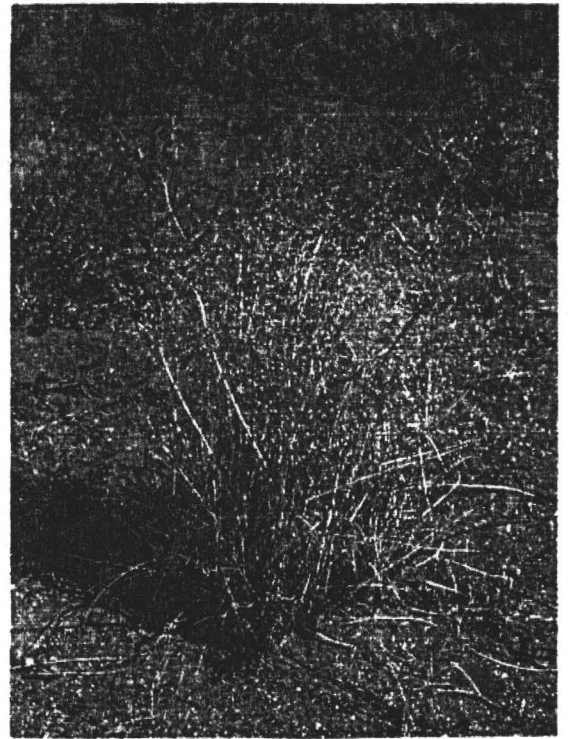
1989 Grazing Year
Horse Use Only
No Livestock Past 2 Years

No-Use	
Slight Use	
Light Use	
Moderate Use	
Heavy Use	
Severe Use	





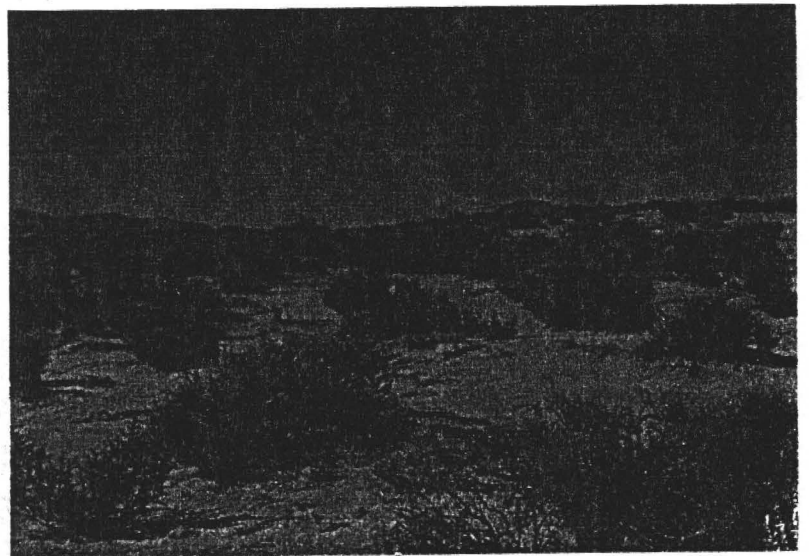
1



2



3



4

All photos were taken on October, 11 & 12, 1989.
Photos 1 & 2 are typical examples of healthy Indian ricegrass plants
taken several miles west of the HMA in an area seldom used by wild horses due
to the distance from water.
Photos 3 & 4 are typical examples of Indian ricegrass within the HMA.



**COMMISSION FOR THE
PRESERVATION OF WILD HORSES**

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October 12, 1990

James M. Phillips, Area Manager
Lahontan Resource Area
BLM - Carson City District
1535 Hot Springs Road, Ste. 300
Carson City, Nevada 89706-0638

Dear Mr. Phillips,

The Commission has commented previously on the fact that the Carson District is the only District in the State of Nevada wherein the land use planning document put out for public comment, and assumed by the public to be factually correct, was and is a misrepresentation to the public. The map for the Lahontan Resource Management Plan Area for wild horses in the Lahontan RMP and EIS (1985), depicts a slashed area where wild horses have been eliminated from their 1971 habitat and the solid color depicts wild horse use areas. The Commission has argued previously that the public was led to believe that the solid areas were the areas where BLM would manage wild horse populations. The District's argument has been that NSO changed the terminology which led to the confusion. The facts are: 1) the Lahontan RMP and EIS was finalized in 1985; and 2) the NSO and Bureau's policy's definitions were implemented in 1983, two years previous to the final document. Furthermore, no subsequent document has been publically circulated amending the definitions to the LUP. Now the Commission is in receipt of the Clan Alpine Allotment Evaluation wherein (pg 3, III c (c)) states "Initially, manage for wild horses and their habitat in current herd use areas at present (1982) population levels." (emphasis and date added)

The continued use of this terminology is prima facie evidence that the Carson District did refuse and continues to refuse to admit that the herd use areas in the 1985 LUP, represented year long habitat, which reflects their biotic needs (summer and winter habitat, (space), mountains and valley's (cover), etc.). The Carson District cannot blame NSO for the terminology used in the allotment evaluation in 1990, thereby proving to us, that despite arguments to the contrary, the herd use really represents all the biotic requirements of wild horses. (Also see footnotes #17, 20, and 21, in the RPS update 1989).

IV Management Evaluation

1. Actual Use

Cattle.....4/16 - 12/31
Sheep.....12/1 - 3/15

Comment: With the exception of March 15 to April 16, the allotment is used yearlong by livestock. Page 7 indicates where livestock actual use was unavailable that grazing licenses were substituted. The RPS 1989 update states in Resource and Monitoring that "actual use data will be obtained. The NV-030-87-1, NV-030-3-244, NV-030-88-1, and NV-030-3-239 were only a portion of the trespass noted and were repeated non-willful, in addition to a lack of actual use, how does the BLM propose to correlate the licenses and trespass with the use pattern mapping.

The Commission insists that BLM fix the problem by identifying areas of over utilization through the use pattern mapping. Until you can demonstrate how many animals are over utilizing the vegetative resource, by species, in the use mapping; the severe reductions of wild horses, with the status quo on livestock is unwarranted.

IV (B) d. Summary of Actual Use (AUM's) is improper terminology when the following paragraph on page seven states actual use was not available on some use. Nor does the table indicate whether these AUM's represent unreported or reported trespass use.

Noting the census maps in the Carson District it appears that wild horses are utilizing the upper most portions of their range, with the exception of Cherry Valley. Of course utilization would have dropped after removal of wild horses, it would have dropped after removal of livestock as well. But, BLM insists on maintaining levels of livestock grazing without subtracting those AUM's necessary for wild horses.

b) Use Pattern Mapping

You state studies are completed in winter after the removal of livestock...December or March?

Conclusions

It appears that if there is not a shortage of available forage (pg 12, B2) but a distribution problem, that the same would apply to wild horses. How do you know that removal is the only solution for wild horses when nothing else has been tried.

We don't believe the District has proven that horses are moving outside the HMA due to populations when in fact the HMA does not provide for their yearlong habitat requirements. We

James M. Phillips
October 12, 1990
Page 3

believe the areas the horses use, not necessarily talking numbers, are the horses preferred habitat, or even their "real" 1971 habitat. If the horses' habitat reflected reality, then numbers of animals would not be an issue. How you can state there is "not a shortage of forage" for livestock (page 12, V, B, 2), yet claim horses are expanding their range because of insufficient forage (page 13, V, B, 3)!

VI Technical Recommendations

A(1) If you can push cows down from Cherry Creek, you can push horses as well. If that fails, then reduction of each species based on their numbers should be reduced until the proper utilization levels are reached.

We will not support permanent elimination of wild horses from their habitat. If their elimination would have no affect on current populations, then why do horses use it?

We have no objection to the fencing of riparian areas.

Your utilization table on page 8 states that Key areas 1,2, and 3, are "primarily used by wild horses, with very little utilization coming from domestic livestock." Yet on page 15, you calculate 3931 AUM's available and these AUM's will "be split evenly between wild horses and livestock, each using 1966 AUM's."

If 1966 AUM's are in your opinion, "little utilization by livestock," then we can now understand why the Clan Alpine Allotment Evaluation puts all the blame for utilization on wild horses. We definitely agree on one issue, extalbishment of Key areas in Shoshone Meadows and the portion near the New Pass Mountains.

Even if Bighorn were not identified in the RPS, we would object to the change from sheep to cows. We object to the conversion in dual use areas.

Thank you for the opportunity to be part of the evaluation process. If you have any questions, please feel free to call.

Sincerely,



CATHY BARCOMB
Acting Executive Director

cc: Fred Wolfe, Acting State Director
Dan Rathbun



COMMISSION FOR THE
PRESERVATION OF WILD HORSES

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October 11, 1990

James M. Phillips, Area Manager
Lahontan Resource Area
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1535 Hot Springs Road, Ste. 300
Carson City, Nevada 89706-0638

Dear Mr. Phillips,

Thank you for the opportunity to comment on the Lahontan Allotment Evaluation.

Some of our Commission members are aware of the range conditions in the Lahontan Allotment and agree that adjustments in grazing populations are required. The Commission commends monitoring and heartily recommends continued monitoring from which adjustments in numbers of animals will be based.

The Commission once again questions the herd boundary. It appears that the Carson District is the only District in the State of Nevada where herd boundaries were misrepresented in the land use planning; and it is most certainly the "only" District that did not take the horses' biotic needs into consideration when the boundaries were drawn.

There are no natural waters within the HMA, forcing wild horses to depend on livestock season of use or travel outside the HMA when livestock are not present.

This same situation existed for Horse Springs, and the lack of water within the HUA was given as a reason for elimination of the herd area.

We do not agree that "when the wild horses are removed from areas outside the HMA and adjusted within the HMA, that adequate forage will be available to meet the requirement of 1155 AUM's of livestock forage..."

VI Technical Recommendations

No where do we see any provision to guarantee waters within the HMA, thereby assuring wild horse biotic needs.

You should key in the 1155 AUM's into the computation and adjust livestock as well.

James M. Phillips
October 11, 1990
Page 2

Unless the issues of proper delineation of boundaries are addressed, which would resolve the conflicts of providing sufficient habitat for wild horses, the Commission would have no choice but to appeal any proposed reduction.

It is definitely within the power of the Carson District to resolve this "Carson District issue" so that proper management of wild horses can continue.

If you have any questions, please feel free to call.

Sincerely,

CATHY BARCOMB
Acting Executive Director

W H O A

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



... a note from

Dawn Y. Lappin

October 11, 1990

James M. Phillips, Area Manager
Lahontan Resource Area
BLM - Carson City District Office
1535 Hot Springs Road, Ste. 300
Carson City, Nevada 89706-0638

Dear Mr. Phillips,

Thank you for the opportunity to comment on the Lahontan Allotment Evaluation.

I am aware of the range conditions in the Lahontan Allotment and agree that adjustments in grazing populations are required. I commend monitoring and heartily recommend continued monitoring from which adjustments in numbers of animals will be based.

I once again question the herd boundary. It appears that the Carson District is the only District in the State of Nevada where herd boundaries were misrepresented in the land use planning; and it is most certainly the "only" District that did not take the horses' biotic needs into consideration when the boundaries were drawn.

There are no natural waters within the HMA, forcing wild horses to depend on livestock season of use or travel outside the HMA when livestock are not present.

This same situation existed for Horse Springs, and the lack of water within the HUA was given as a reason for elimination of the herd area.

I do not agree that "when the wild horses are removed from areas outside the HMA and adjusted within the HMA, that adequate forage will be available to meet the requirement of 1155 AUM's of livestock forage..."

VI Technical Recommendations

No where do I see any provision to guarantee waters within the HMA, thereby assuring wild horse biotic needs.

You should key in the 1155 AUM's into the computation and adjust livestock as well.

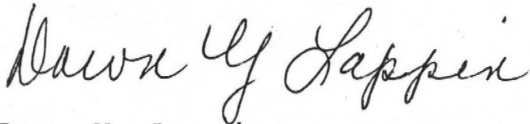
James M. Phillips
October 11, 1990
Page 2

Unless the issues of proper delineation of boundaries are addressed, which would resolve the conflicts of providing sufficient habitat for wild horses, I would have no choice but to appeal any proposed reduction.

It is definitely within the power of the Carson District to resolve this "Carson District issue" so that proper management of wild horses can continue.

If you have any questions, please feel free to call.

Sincerely,

A handwritten signature in cursive script that reads "Dawn Y. Lappin". The signature is written in dark ink and is positioned above the typed name.

Dawn Y. Lappin

cc: Fred Wolfe, Acting State Director
Dan Rathbun