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ELY  
Highland Peak



# United States Department of the Interior

## BUREAU OF LAND MANAGEMENT

Las Vegas District Office  
P.O. Box 26569  
Las Vegas, Nevada 89126

IN REPLY  
REFER TO:

4700  
(NV-053)

02 MAY 1986

### Meomorandum

To: State Director, Nevada (N-930)  
From: District Manager, Las Vegas  
Subject: Highland Peak Herd Management Area Plan  
and Environmental Assessment

Enclosed are copies of the second draft of the Highland Peak Herd Management Area Plan and Environmental Assessment for your review and comment.

Enclosure:

BUR. OF LAND MANAGEMENT  
NEVADA STATE OFFICE  
1986 MAY -5 AM 9:00

DRAFT

ENVIRONMENTAL ASSESSMENT

for the

HIGHLAND PEAK HERD

MANAGEMENT AREA PLAN

EA# NV-057-6-41



# United States Department of the Interior

## BUREAU OF LAND MANAGEMENT

Callente Resource Area

P. O. Box 237

Callente, NV 89008

IN REPLY  
REFER TO:

4700  
Highland Peak  
(NV-057.7)

APR 15 1985

(702) 726-3141

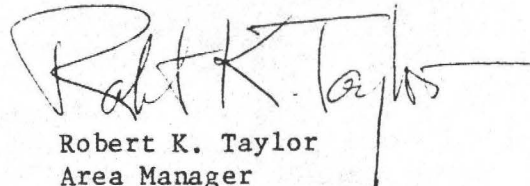
Dear Sir:

Enclosed is a draft of the Highland Peak Herd Management Area Plan and associated Environmental Assessment.

If you have comments concerning these plans and would like your comments considered prior to finalizing the plans, then please submit your comments to the Callente Resource Area Office at the above indicated address before May 15, 1986.

Also enclosed is the Bureau of Land Management Mailing List Update. Please fill out as instructed and return within 30 days. Thank you.

Sincerely,



Robert K. Taylor  
Area Manager

Enclosures 3

BLM Mailing List Update  
Highland Peak HMAP  
EA #NV-057-6-41

Highland Peak  
4700  
(NV-057.7)

DRAFT

ENVIRONMENTAL ASSESSMENT

for the

HIGHLAND PEAK HERD

MANAGEMENT AREA PLAN

EA# NV-057-6-41

Prepared by:

Phillip C. Seegmiller  
Range Con/WH&B Spec.

Date

Bureau of Land Management  
Caliente Resource Area  
Las Vegas District  
Caliente, Nevada

I. INTRODUCTION/OVERVIEW

The purpose of this Environmental Assessment (EA) is to analyze the impacts of the Highland Peak Herd Management Area Plan (HMAP) to determine whether or not an EIS is needed.

The Proposed Highland Peak Herd Management Area (HMA) is located one mile northwest of the city of Caliente, Nevada, to and including the Ely Springs Range and the Highland Peak Range.

The Highland Peak HMA is comprised of approximately 139,625 total acres. There are seven livestock grazing allotments involved with the HMA; Bennett Springs, Black Canyon, Ely Springs Sheep, Highland Peak, Klondike, Pioche, and Rocky Hills. The Class of Livestock Authorized is sheep except for the Ely Springs Sheep and Pioche Allotments which is dual cattle and sheep. Utilization levels for livestock and wild horses throughout the Herd Management Area averages slight. The majority of wild horse use occurs in the northwest and northeast portion of the HMA.

The last census of wild horses in the HMA was conducted in 1984 and the result was 49 wild horses actual count. Aerial censuses invariably undercount total number of wild horses per given area, and there has been no correction factor developed for this area. The need for wild horse management in this area was identified by the Management Framework Plan (MFP) Step 3 Decisions for the Caliente Planning Unit. This Environmental Assessment is written in conjunction with the HMAP. The HMAP should be referred to for detailed description of the present situation and management objectives.

Both the HMAP and EA were developed through coordination during the planning phase with various interest groups and state agencies.

II. PROPOSED ACTION AND ALTERNATIVES

The proposed action is to implement the Highland Peak Wild Horse Herd Management Area Plan and achieve the objectives outlined in the plan. These objectives address; attaining a static to upward trend in the ecological status of vegetation, achieving a good physical condition for wild horses, maintaining seasonal movement and distribution patterns for wild horses, maintaining a viable breeding population within the management range of 40-50 head.

As outlined in the HMAP management methods are used to try to obtain the desired objectives as well as to monitor the progress towards achieving them. The management methods outlined in the Highland Peak HMAP call for maintaining populations of wild horses at the management range of 40-50 head. Thus when the population exceeds 50 head their numbers will

be removed down to 40 head. Developing additional reliable water sources is another method used to better distribute the animals and reduce stress in certain areas for lack of adequate amounts of water. Introduction of wild horses from other areas to aid in maintaining vigor. Assure the free-roaming seasonal movement and distribution patterns of the wild horses. Plus, monitoring and analyzing the wild horse population and the vegetation resource to determine to what extent the objectives are being met, which will aid in determining, if any, new management direction.

Alternative A: No action alternative. Management would remain the same, wild horse populations would be allowed to increase unchecked.

Alternative B: Complete removal of wild horses.

### III. AFFECTED ENVIRONMENT

The existing environment for the Caliente Resource Area is discussed in the Caliente Final Environmental Statement (INT-FES 79-44).

### IV. IMPACTS OF THE PROPOSED ACTION AND ALTERNATIVES

A. Livestock Grazing: Under the proposed action, in the short term as well as the long term, livestock would realize a beneficial impact as a result of reduced ungulate competition around waters and throughout the HMA as a whole. In time this reduced competition would result in an increase in available forage.

The impacts from Alternative A during the short term would be the same as what occurs now. During the long term as the wild horse population increases the areas would degrade, available forage would decrease, competition would increase.

The impacts from Alternative B would be almost the same as the proposed action except there would be no competition with wild horses.

B. Wildlife: Impacts from the proposed action as well as Alternatives A and B are the same as impacts to livestock.

C. Wild Horses: Impacts from the proposed action to the wild horse population remaining would be the same as to livestock. In addition, there would be unavoidable impacts in the form of injuries (less than 2% of animals removed) as well as a change in lifestyle for the animals captured.

The impacts from Alternative A would be the same for wild horses as Alternative A for the livestock.

The impacts from Alternative B would be almost the same as the proposed action except all wild horses would be removed.

- D. Minerals: No impacts from proposed action or alternatives.
- E. Wilderness: No impacts from proposed action or alternatives.
- F. Realty: No impacts from proposed action or alternatives.
- G. Forestry: Under the proposed action reduced ungulate competition would benefit seedling establishment during the short and long term.

The impacts under Alternative A would tend to in the long term result in a general degrading of forage condition which might benefit Forestry as a result of reduced species completion for water and nutrients etc.

The impacts under Alternative B would be the same as the proposed action.

- H. Recreation: No impacts from proposed action or Alternative A. Under Alternative B the recreation experience might be considered lower for not being able to see wild horses within the area anymore.
- I. Cultural Resources: Under the proposed action and Alternative B, previously undiscovered artifacts may be disturbed during the implementation process.

No impacts under Alternative A.

- J. Visual Resources: Within the HMA all three visual class ratings occur (II, III, and IV). Under the proposed action specific projects may affect the VRM but that action will be addressed by site specific EA's.
- K. Soils: Under the proposed action, short term, soils would be disturbed at capture locations. In the long term as available forage increase soils should become more stable.

The impacts under Alternative A would result in greater erosion in the long term.

The impacts under Alternative B would be the same as for the proposed action.



L. Threatened/Endangered Flora and Fauna: According to a literature search conducted in the Caliente Resource Area Office and review of Federal and State updates, there are no Federally listed or candidate threatened and/or endangered flora or fauna in the HMA.

V. STANDARD MITIGATION MEASURES AND STIPULATIONS

A. Any projects required as a result of implementation of this HMAP will have a site specific EA completed prior to any field work.

VI. CONSULTATION AND COORDINATION

The Highland Peak Herd Management Area Plan and this EA are available for review by all interested persons, groups, etc., for a period of 30 days. Comments will be reviewed for consideration into the Herd Management Area Plan. These documents also are going through intensive internal review (Nevada State Office, Las Vegas District Office, and Caliente Resource Area Office) with comments being incorporated into the plans as appropriate. Caliente Resource personnel reviewing the HMAP and EA are:

Eddie Guerrero - Wildlife Biologist/Environmental Coordinator

Richard Orr - Supervisory Range Conservationist

Richard Nichols - T/E Plant Specialist

Cory Bodman - Soil Scientist

Doug Certain - Forester

Mike Neff - Range Conservationist

Terry Smith - Range Conservationist

Larry Lacey - Range Tech/Minerals

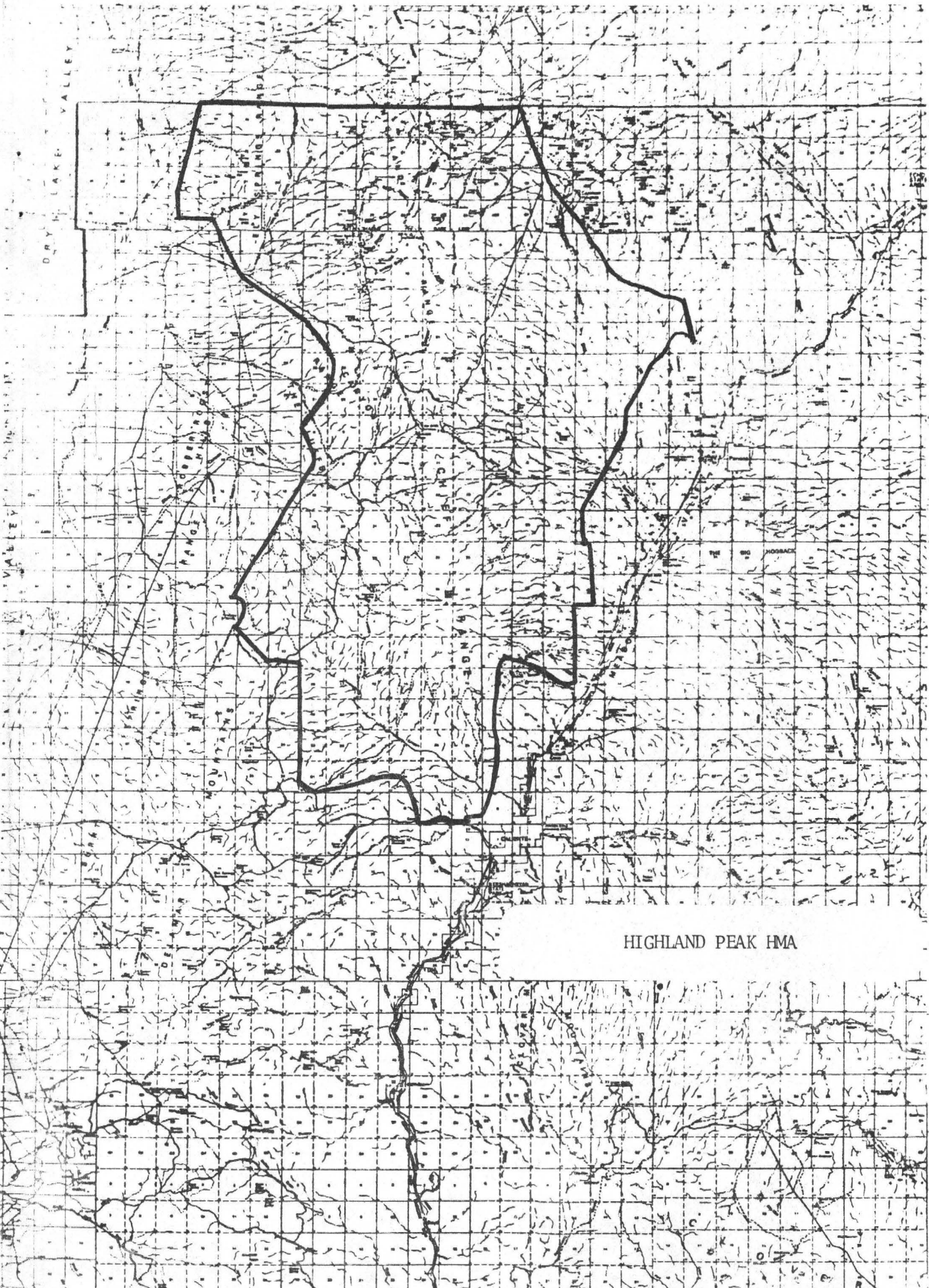
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T. 6 S.

HIGHLAND PEAK HMA

DRAFT

HIGHLAND PEAK

HERD MANAGEMENT AREA PLAN



# United States Department of the Interior

## BUREAU OF LAND MANAGEMENT

Caliente Resource Area

P. O. Box 237

Caliente, NV 89008

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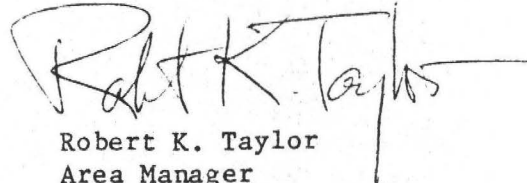
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If you have comments concerning these plans and would like your comments considered prior to finalizing the plans, then please submit your comments to the Caliente Resource Area Office at the above indicated address before May 15, 1986.

Also enclosed is the Bureau of Land Management Mailing List Update. Please fill out as instructed and return within 30 days. Thank you.

Sincerely,



Robert K. Taylor  
Area Manager

Enclosures 3

BLM Mailing List Update  
Highland Peak HMAP  
EA #NV-057-6-41

DRAFT

HIGHLAND PEAK

HERD MANAGEMENT AREA PLAN

Caliente Resource Area

Las Vegas District

TABLE OF CONTENTS

I.	INTRODUCTION . . . . .	1
II.	BACKGROUND INFORMATION . . . . .	2
	A. Location and Size . . . . .	2
	B. Resource Data . . . . .	2
	1. Vegetation . . . . .	3
	2. Soils . . . . .	3
	3. Ecological Status and Trend . . . . .	3
	4. Watershed . . . . .	3
	5. Water . . . . .	3
	6. Animals . . . . .	4
	a. Wildlife . . . . .	4
	b. Livestock . . . . .	4
	c. Wild Horses . . . . .	6
	1) Present Situation . . . . .	6
	a) Population Size . . . . .	6
	b) Color . . . . .	7
	c) Gathering . . . . .	7
	d) Condition . . . . .	7
	e) Cover . . . . .	7
	f) Seasonal Use & Home Ranges . . . . .	8
	g) Population Demography . . . . .	8
	7. T & E. . . . .	8
	8. Recreation . . . . .	9

	C.	Existing Projects . . . . .	9
		1. Water Development . . . . .	9
		2. Fencing . . . . .	9
	D.	Coordination . . . . .	9
		1. Relationship to Other Resource Use . . . . .	9
		a. Wild Horse - Wildlife . . . . .	9
		b. Wild Horse - Livestock . . . . .	10
	E.	Management Number . . . . .	10
III.		OBJECTIVES . . . . .	11
IV.		MANAGEMENT METHODS . . . . .	11
	A.	Objective #1 . . . . .	11
		1. Management Method . . . . .	11
	B.	Objective #2 . . . . .	13
		1. Management Method . . . . .	13
	C.	Objective #3 . . . . .	13
		1. Management Method . . . . .	13
	D.	Objective #4 . . . . .	14
		1. Management Method . . . . .	14
	E.	Objective #4 . . . . .	14
		1. Management Method . . . . .	14
	F.	Population Adjustment . . . . .	14
V.		STUDIES AND ASSESSMENT . . . . .	15
	A.	Habitat . . . . .	15
		1. Key Areas and Key Species . . . . .	15
		2. Utilization . . . . .	15

3. Trend . . . . .	15
4. Water Sources . . . . .	16
5. Actual Use . . . . .	16
B. Population . . . . .	16
1. Physical Condition . . . . .	16
2. Productivity and Survival . . . . .	16
3. Sex Ratio Determination . . . . .	16
4. Age Structure Evaluation . . . . .	17
5. Home Ranges and Seasonal Movement Patterns . .	17
6. Color . . . . .	17
7. Relocation . . . . .	17
VI. MODIFICATION . . . . .	18
VII. APPROVAL . . . . .	18
APPENDIX I . . . . .	19
GLOSSARY . . . . .	20-23
LITERATURE CITED . . . . .	24



I. INTRODUCTION

Preparation of a wild horse herd management area plan designed to specifically manage the wild horses populating the Highland Peak region with multiple use taken into consideration was recommended by the Caliente Management Framework Plan (Las Vegas Bureau of Land Management, U.S. Department of Interior, 1980).

The Highland Peak Herd Management Area Plan (HMAP) is designed to effectively manage the wild horse population in accordance with the Bureau of Land Management NSO Manual Supplement 4730 (November 24, 1982), and 43 Code of Federal Regulations 4700. Effective management of the wild horse population is essential to ensure a net benefit to the valuable resources (i.e., vegetation, soils, wild horses, wildlife, etc.) which occupy the area.

This HMAP was developed in coordination with other resource users in the Highland Peak area. It coordinates the objectives of other programs and is designed so as to facilitate the following objectives:

Range

- (1) Maintain the ecological status at a static to upward trend for the vegetative resource.
- (2) Continue management, and development at a level which will maintain forage at present active preference.
- (3) Continue to permit rangeland improvement and project development and maintenance which will achieve allotment objectives.

Wildlife

- (1) Provide sufficient forage to sustain existing populations of and future reasonable numbers of wildlife (especially the summer range).
- (2) Implement plans which will achieve habitat management objectives for grazing allotments (i.e., riparian habitat protection, vegetation manipulation, etc.).

## II. BACKGROUND INFORMATION

### A. Location and Size

The Highland Peak HMA is located within Lincoln County, Nevada, one mile northwest of the City of Caliente. The Highland Peak HMA is comprised of the following grazing allotments: Ely Springs Sheep; Bennett Springs; Rocky Hills; Black Canyon; Klondike, and that portion of Highland Peak and Pioche Allotments southwest of the Caselton Highway to the District line. A map of the HMA is shown in Appendix I.

There are 139,625 total acres in the Highland Peak HMA. A breakdown by land status of the 139,625 areas included within the HMA is shown in Table I.

TABLE I

#### Land Status

<u>Land Status</u>	<u>Acres*</u>	<u>Percent of Total</u>
Public Land	137,776	99%
Private Land	1,849	1%

\* Compiled from Caliente Unit Resource Analysis Table .44-9 and Master Title Plats (U.S. Department of the Interior, 1978). Acreage portrayed in approximates.

### B. Resource Data

A more complete discussion of the existing environment can be found in the Caliente Final Environmental Statement (INT-FES 79-44).

#### 1. Vegetation

There are two major vegetation communities on the HMA. Pin-yon-juniper with sagebrush understory extending over the low hills and mountains comprising 69% of the management area, and sagebrush extending over most of the rolling hills and valleys comprising 25% of the management area. Four other minor communities make up the other 6%; other Desert shrubs, Oakbrush, Rabbitbrush, and Saltbush. Additional information on composition of vegetation communities for the area may be

obtained from the Caliente Final Environmental Statement (INT-FES 79-44). Vegetation utilization and trend data for the HMA is unavailable at present. Such data is necessary to determine if the actual numbers of horses using the area are in balance with the vegetative resource.

2. Soils

The Caliente Resource Area is presently undergoing a third order soil survey. When all information is compiled and made available it will be incorporated as necessary into the HMA Monitoring Program.

3. Ecological Status and Trend

Ecological status will be determined following completion of the soil survey.

Trend studies (frequency method) were initiated in the spring of 1983 within the HMA. These frequency plots were to serve to measure the effects of both domestic livestock and wild horse use. Vegetative trends can only be determined after many years of data collection.

4. Watershed

Four main watershed areas are located in the Highland Peak HMA. Erosion condition class designated on these areas varied from slight to critical with present condition anticipated to deteriorate over the next 15 years. For additional information see the Caliente Unit Resource Analysis (U.S. Department of Interior, 1978).

5. Water (Appendix I)

Water sources for wild horses and wildlife are limited throughout the Highland Peak HMA. At present, 100% of the available permanent water sources, that exist on public lands, are located in the north quarter of the HMA. Ely Springs, which is on private land, and Tex Spring are located in the northwest corner of the HMA. Connor, Floral, Pine, Highland, Deadman, Lime & Unnamed Springs are located on the east side of the Highland Range in the north central portion of the HMA. Down in the lower central portion of the HMA is George's Water and Klondike Spring, neither of which are available to wild horses. Two other sources exist and are available at present for wild horse use but they are located on private land. Bennett Springs in the center of the HMA and an unnamed spring at the lower end of the HMA, both are on private land.

6. Animals

a. Wildlife

Mule deer are found year-round in the HMA with summer use on the Highland Peak Range.

Other wildlife species found in the area include a variety of raptors, such as golden eagles and hawks, numerous small birds and small mammals, and many reptiles. Jackrabbits and cottontails are common, but population levels fluctuate periodically in high/low cycles. Also, antelope have recently been transplanted in adjacent Dry Lake Valley. Additional information concerning species, their habitat and distribution can be found in the Caliente Unit Resource Analysis (BLM, Las Vegas, 1978).

b. Livestock

There are seven livestock grazing allotments involved with the HMA; Bennett Springs, Black Canyon, Ely Springs Sheep, Highland Peak, Klondike, Pioche, and Rocky Hills. All of these grazing allotments except Pioche and Highland Peak are included in their entirety.

The Ely Springs Sheep Allotment is identified to have an Allotment Management Plan (AMP) developed. Development of an AMP requiring extensive fencing could result in restricting the normal wild horse distribution and movement patterns. However, there are no immediate plans for AMP implementation on any of the allotments in the HMA. If and when AMP's are developed, then coordination with all users will aid in resolving conflicts.

The Rocky Hills Allotment grazing privileges were relinquished back to the United States of America, USDI, Bureau of Land Management, by the Lambeth Brothers, after they were paid valuable consideration by the National Mustang Association.

The total number of Active Livestock AUMs authorized in the HMA is 10621 with sheep and cattle as the class of livestock authorized. Table 2 lists the livestock AUMs for each allotment, plus season-of-use, class of livestock and the percent of the allotment within the HMA.

TABLE II  
Livestock Grazing Privileges\*\*

<u>Allotment</u>	<u>% Within Management Area</u>	<u>Active Preference</u>	<u>Season-of-Use</u>	<u>Class of Livestock</u>
Bennett Spr.	100%	3498	10/16 - 4/30	S
Black Canyon	100%	1005	10/16 - 4/30	S
Ely Spr. Sheep	100%	1802	10/16 - 5/15	C&S
Highland Peak	82%	3704	10/16 - 5/15	S
Klondike	100%	678	10/16 - 5/15	S
Pioche	73%	402	Yearlong	C&S
Rocky Hills	100%	308*	---	---

\* The Rocky Hills Allotment has been relinquished back to the United States Bureau of Land Management, hence, AUMs listed indicate historical Authorized Preference only.

\*\* Information acquired from operators case files reserved in the Caliente Bureau of Land Management Office.

Livestock grazing within the HMA has not been consistent. Ely Springs Sheep and Rocky Hills have not received any grazing use in the past five years. The Pioche Allotment has received some sheep use but no cattle use in the past five years. The extent of grazing use in the Pioche, Highland Peak, Bennett Springs, Black Canyon, and Klondike has been about 40-60% of active preference over the past five years. Use occurs throughout most of these allotments because of the herding techniques employed to manage sheep.

## c. Wild Horses

## 1) Present Situation

## a) Population Size

Though wild horses have been known to exist in the Highland Peak HMA for many years, demographic information was not obtained prior to passage of the Wild Free-Roaming Horse and Burro Act of 1971 (P.L. 92-195). Subsequent to the passage of the Wild Free Roaming Horse and Burro Act, aerial censuses were conducted to obtain the necessary information for initial wild horse management to begin. In 1973 the inventory was conducted with subsequent censuses in 1974, 1977, 1982, and 1984. All censuses, except the 1982 census, were accomplished by use of a helicopter. The 1982 census was accomplished using a fixed wing aircraft. The census results are disclosed in Table III.

TABLE III

## Wild Horse Census

<u>Census Date</u>	<u>Census Count</u>
1973*	19
1974*	20
1977*	24
1982**	37
1984**	49

\* Caliente Unit Resource Analysis (Table 44-8).

\*\* Caliente Resource Area personnel secured data. Data includes young of year. This data reflects the 1980 wild horse round-up. A more detailed account of the inventory is reserved in the Caliente Resource Area, Bureau of Land Management Office.

Aerial census invariably underestimate total numbers of wild horses per given area and there is no correction factor developed for this area. Thus count data secured on the Highland Peak HMA Population is presumably below the actual population size.

## b) Color

Color varies from white to black and all shades in between with sorrel and bay colors being most dominant. Table IV depicts the color variations from the 1982 and 1984 census.

TABLE IV

Color\*

---

<u>Color</u>	<u>Percentage</u>
Bay	42%
Sorrel	36%
Black	12%
Palomino	5%
White	3%
Gray	1%
Roan	1%

---

\* Percentage each color represents as averaged from the 1982 & 1984 census.

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## c) Gatherings

One minor gathering operation was conducted in the Highland Peak HMA. This capture took place during the summer of 1980 resulting in the removal of 15 head of wild horses. These horses were subsequently placed into the Adopt-A-Horse program.

## d) Physical Condition

Generally, the animals removed during capture operations were in fair to good condition. The population as a whole appeared healthy with isolated maladies affecting some of the older animals.

## e) Cover

The main source of cover is provided by the pinyon-juniper on the mountain slopes. Rocky outcrops along the foothills and canyons provide additional cover.

f) Seasonal Use and Home Range

A comprehensive study has never been performed to determine the seasonal use patterns and home ranges of wild horse bands inhabiting the management area. Identification of major use areas, however, was accomplished (Appendix I). Accurate knowledge pertaining to wild horse movement patterns is important in order to understand animal/vegetation interrelationships and to minimize interference with the free-roaming behavior of wild horses when intensive grazing management requires management facilities such as fencing. The limited information obtained thus far shows the horses tend to concentrate in the areas closer to water sources during the summer months, extending their use area much further away from water during colder months.

Three wild horse use areas have been identified in the area, Ely Springs, East Highland, and West Chief. Horses from the Ely Springs area seldom mix with the other two. East Highland and West Chief do intermix especially during the winter months.

g) Population Demography

There is no data for sex ratio, age structure, or mortality. A reproductive rate based on limited data was calculated from one years' census is approximately 19.5%. Effective management of wild populations is contingent on the acquisition and accurate interpretation of reliable sex and age data. Management of wild horse populations is no exceptions. Sex and age information secured through capture operations is a reliable technique utilized by the Bureau of Land Management to analyze population processes for management purposes. Thus far there have been no significant capture operations within the Highland Peak HMA. Analysis needs for the Highland Peak Herd Management Area population are: sex ratio, age structure, productivity, and mortality or conversely survival.

7) Threatened and Endangered Species

There are no known threatened/endangered species in the Highland Peak HMA.



8) Recreation

The Highland Peak HMA incorporates many areas which provide a variety of recreation pursuits, including sight-seeing, hiking, off-road vehicle (ORV), hunting, camping, etc. Off-road vehicle competitive events are permitted on a case-by-case basis via Special Recreation Use Permits. Such competitive events could conceivably interrupt wild horse movement patterns and create undue harassment.

C. Existing Projects (Appendix I)

1. Water Developments

Water developments are limited in the management area with most needing maintenance to major reconstruction in order to make water available for wild horses and wildlife. Klondike Spring, George Rogers Well, Ely Springs, Tex Springs, and Tank Spring are water base for livestock grazing allotments though wild horses do have access now. Availability of the water sources in the future for wild horses is not guaranteed. The south half of the HMA will require water development to alleviate water problems to that portion of the wild horse population.

2. Fencing

The majority of the HMA on the west boundary is fenced with only small portions of the north, south, and east boundaries being fenced. Also the east half of the allotment boundary between the Highland Peak and Bennett Springs Allotment is fenced.

Wild horse movement as a result of a lack of fences around the HMA boundary is only significant in the north east corner.

D. Coordination

1. Relationship to Other Resource Use

a. Wild Horse - Wildlife (Appendix I)

Mule deer utilize most of the HMA on a year-round basis except for the higher areas of the Highland Range which is considered summer use only. The Caliente Management Framework Plan recognized deer "reasonable numbers" at approximately 284 (U.S. Department of Interior, 1980). Separation of mule deer reasonable numbers by allotment is presented in Table V.

TABLE V

## Mule Deer Reasonble Numbers

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Allotment	Mule Deer Reasonable No.'s
Pioche	24
Highland Peak	100
Bennett Springs	100
Black Canyon	21
Klondike	16
Ely Springs Sheep	19
Rocky Hills	4

Note: DY = Deer use on a yearlong basis

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b. Wild Horse - Livestock

Conflicts with intensive livestock grazing management and wild horses could result where additional fencing is required to implement successful grazing systems. By acquiring adequate knowledge of the home ranges of wild horses fence design and location can be modified to reduce conflicts.

The Coordinated Resource Management Planning Process (CRMP) and range monitoring systems are integral parts of the wild horse and livestock management programs. Coordination of installation and reading of monitoring studies and providing for the genuine participation in these processes by interested parties will diminish the potential for resource conflicts.

E. Management Number

As a result of the CRMP process it was determined that wild horse actual count numbers from a one point in time census would not be the numbers used as the appropriate management level (AML). The appropriate management level or management range, that adjustments to the wild horse population would be based upon, would be determined through the CRMP process when wild horse herd management area plans are written. The census numbers along with any other information in the data base would be presented to the CRMP Committee whereupon they will make a recommendation as to the appropriate management level or management range for wild horses in the HMA.

After completing the above process the Lincoln County CRMP Committee has, based on available information, recommended an appropriate management range of 40-50 head (actual count) of wild horses for the Highland Peak HMA.

### III. OBJECTIVES

The overall objectives are to maintain and manage populations of wild, free-roaming horses as recognized components of the public land environment, in balance with their habitat and other resource uses.

- A. Assist the wildlife and livestock interests in attaining a static to upward trend in the ecological status of vegetation within 10 years.
- B. Within 10 years, achieve a desired physical condition for wild horses of "good."
- C. Within five years affirm the unrestrained wild horse seasonal movement and distribution patterns.
- D. Manage the wild horse population at an appropriate management range of 40-50 head of animals.
- E. Maintain a viable breeding population.

### IV. MANAGEMENT METHODS

- A. Objective 1: Assist the wildlife and livestock interest in attaining a static to upward trend in the ecological status of vegetation within 10 years.

1. Management Method

- a. Within one year key forage areas and key forage species will be selected using the Nevada Range Monitoring Task Force Procedures. Criteria for selection of key areas will be that they provide a significant amount of the available forage and be selected only after a careful evaluation of the current pattern of grazing by the wild horses has been determined. Key Areas will be selected within a range site and contain the key species or have the potential to produce the key species to be monitored.

Key forage plant species should be palatable to the wild horses during the yearlong season of use. Key species should provide more than 15% of the available forage in the grazing

area or have the potential for greater production if it is critical to the needs of the wild horses. The key species must be a perennial forage plant; and be consistent with management objectives that will be developed for the plant community.

The following types of studies may be conducted at each key area: Utilization, frequency, ground cover, climate, ecological status and trend.

Within six years, all key areas and key species will be evaluated to determine their effectiveness in reflecting the current management on the HMA.

- b. Determine allowable use factors on key forage plants species for wild horses on each key area within ten years not to exceed the allowable use factors as established by the Nevada Range Monitoring Task Group (1984) and BLM Manual 4412.

If wild horse utilization levels reach the allowable use factors established for wild horses, then wild horses may be removed down to a level that would provide use at 15% less than the allowable use factors. Adjustments in grazing pressure would be made either HMA wide or from smaller use areas depending on results of monitoring studies. In ten years, all available data will be analyzed to determine allowable use for wild horses in relation to livestock and wildlife.

Total Allowable Use Factors For All Grazing Animals As Established by the Nevada Range Monitoring Studies Task Group are:

<u>Plant Category</u>	<u>Spring</u>	<u>Summer</u>	<u>Fall</u>	<u>Winter</u>	<u>Yearlong</u>
Perennial Grasses and Grasslike	50%	50%	60%	60%	55%
Shrubs, Half Shrubs and Trees	30%	50%	50%	50%	45%

- c. Range sites have not been determined for the Highland Peak HMA and will not be determined for at least another five years. However, during the interim frequency and ground composition will be measured using methodologies as established by the Nevada Range Monitoring Task Group (Nevada Rangeland Monitoring Handbook, First Edition, 1984) to determine trend.

Until ecological status and trend is determined, maintaining a static to upward trend in vegetation characteristics may be accomplished through control of grazing pressure.

All studies data will be analyzed in 10 years to determine if the objective is being met.

B. Objective 2: Within five years achieve a desired physical condition for wild horses of "good."

1. Management Method

- a. Maintenance of animals in good physical condition can be obtained by maintaining wild horses at the AML as determined by CRMP. Wild horse numbers to be further refined through analysis of vegetation monitoring data.
- b. Animals in good physical condition can also be obtained by providing sufficient reliable water sources for wild horses in areas where water is lacking. Therefore, during FY 1986 propose development of a water catchment for wild horses and livestock. Preparation of planning documents to be completed by the end of FY 88. Also, prepare agreement with private land owner concerning the use of private spring source on private land to accomodate approximately ten head of wild horses. Agreement to be completed by the end of FY 86 ensuring protection for the well being of the wild horses and minimizing the potential for damage to private property.
- c. Wild horse condition will be evaluated in five years to see if objective is being met. Physical condition of wild horses will be observed when in the field and during the collection of other population data as described in the studies section.

C. Objective 3: Within five years affirm the unrestrained wild horse seasonal movement and distribution patterns.

1. Management Method

- a. Seasonal movement and distribution patterns will be observed four times per year, during each season. Studies as described in studies section will be completed during censuses or field observations. Seasonal movement and distribution patterns will be correlated with vegetation monitoring data to aid in developing a better monitoring program.

D. Objective 4: Manage the wild horse population at an appropriate management range of 40-50 head of animals.

1. Management Method

- a. When wild horse numbers reach 50 head then their numbers will be adjusted down (based on actual count) to 40 head. Wild horses removed will be placed into the adoption program. Removal procedures will be outlined in removal plan that will be written at the time adjustment becomes necessary.
- b. Studies to collect information relative to sex ratios, age structure, young/adult ratios, average band size will be established on the wild horse population within the Highland Peak HMA. This data will assist managers in better understanding the forces that affect wild horse populations and aid in developing future management strategies. All studies will be correlated with capture data, aerial census data, and vegetation monitoring data. For more details on studies see studies and assessment section.

E. Objective 5: Maintain a viable breeding population of wild horses.

1. Management Method

- a. To ensure survival of a genetically viable population (avoidance of inbreeding depression) introduction of unrelated animals into the population will be attempted periodically

F. Population Adjustment

Initially the wild horse population will be maintained within a range of 40 to 50 animals. Maintaining numbers within this range is the result of intensive CRMP discussion. The CRMP further recommended that the livestock permittees be given back all their SNU AUMs, thereafter, increases would be made proportionately to livestock (using active preference) and wild horses (using actual count numbers) as a basis.

In addition, population adjustments will be conducted when range monitoring studies demonstrate a need. Adjustments will be based on the utilization of key forage species. A basic utilization - population size formula will be employed for calculation necessary adjustments as follows:

$$X = \frac{(\text{Desired Population Size})}{\text{Desired Utilization}} = \frac{\text{Present Population Size}}{\text{Present Utilization}}$$

All population reductions will be in accordance with guidelines established by the Caliente-Virgin Valley Wild Horse and Burro Gathering Plan (retained in the Caliente Bureau of Land Management Office) and 43 Code of Federal Regulations 4740.

## V. STUDIES AND ASSESSMENT

### A. Habitat

#### 1. Key Areas and Key Species

Key areas and key forage plant species will be selected within one year using the methodology as described by the Nevada Range Studies Task Group (Nevada Rangeland Monitoring Handbook, First Edition, 1984). Seasonal movement and distribution patterns of wild horses will be taken into consideration in selecting key areas. Monitoring studies will be conducted in key areas every year, although the types of studies may vary every three years.

#### 2. Utilization

The key forage plant method is the utilization technique adopted for this management plan. Section 4423.33B7C of the Bureau of Land Management Manual and the Range Studies Task Group (1984) describes this particular method adequately. Utilization transects will be conducted in the spring every year prior to start green up of key species in key management areas. Data will be reserved with trend information.

#### 3. Ecological Status and Trend

Range sites have not been determined and will not be for at least another five years at which time the ecological status of vegetation will be determined. Trend is defined as a change in vegetation and soil characteristics as a direct result of environmental factors, primarily climate and grazing. Trend studies will be used in combination with other studies to evaluate the effectiveness of this management plan and will be evaluated every three years. The frequency sampling procedure described by Tueller et. al., (1972) will be the methodology utilized. The data collected will be reserved in the allotment files located in the Caliente Bureau of Land Management Office. Refer to the range monitoring map (Appendix I) for approximate location of the trend plots.

4. Water Sources

Water sources will be monitored monthly during dry periods when horses consume more water to determine that there is an adequate supply for horses using the area.

5. Actual Use

Wild horse actual use estimates will be obtained from aerial census conducted by the Caliente Resource Area Wild Horse and Burro Specialist at a minimum of once every three years in accordance with Nevada State Office Manual Supplement 4730. Census to be conducted in late June or early July. It will require 15 hours of helicopter time to complete each census.

B. Population

1. Physical Condition

Physical condition of wild horses will be determined concurrent with collecting other population studies, and general observation will be made while in the field.

2. Productivity and Survival

Information on young/adult classification will be collected when funding is available, but should be gathered at a minimum of every three years. The survey should be conducted in July and again the following January. Aerial survey will be preferred method used to collect data. However, data could be obtained from ground observations. Additional information should be collected during the survey that would enhance data already contained in the resource files concerning other characteristics of the population (i.e., color, condition, band size, actual count, home ranges, and seasonal movement patterns, etc.).

3. Sex Ratio Determination

Sex determination will be conducted on all horses captured during gathering operations.

Field observation using a spotting scope positioned at strategic locations (water sources, trails, natural salt licks, etc.) will be employed to obtain sex ratio information where possible. Sex ratio should be determined every three years. Studies should be conducted in June or July. Unless all animals in a band can be classified, the data will not be used.



4. Age Structure Evaluation

Relative age structure of the Highland Peak HMA population will be periodically evaluated from age data collected as a result of gathering operations.

5. Home Ranges and Seasonal Movement Patterns

A comprehensive study will be conducted to secure information on home ranges and seasonal movement patterns. This information is essential to supplement utilization studies. Considering the present situation regarding the size and topography of the HMA and the number of wild horses, a study could be conducted with limited funding as follows:

Phase 1 - October, January, April, July

Objective: Determine seasonal movement patterns and home range establishment.

Preferred Method: Aerial observations conducted seasonally (fall, winter, spring, and summer), with sighting locations plotted on a map.

Alternate Method: On the ground observations from a vehicle conducted seasonally (fall, winter, spring, and summer), with sighting locations plotted on a map.

Phase 2 - Evaluation of information acquired through field work.

In addition, information regarding other population characteristics and population dynamics would be gathered at this time (i.e., color, condition, band size, age classes, sex ratio, etc.). This additional information would require use of a spotting scope positioned at strategic locations.

6. Color

Color data for wild horses will be determined concurrent with collecting other population studies.

7. Relocation

The relocation of wild horses within the herd management area may be undertaken on a limited basis to meet management objectives. Relocation is a tool that has utility in maintaining vigor in herds and in enhancing selected characteristics which are managed in a population.

VI. MODIFICATION

Implementation of this plan will result in the first effort at managing wild horses. This plan will be modified as new data and evaluation deem necessary. Any modification of this plan will require public input into the planning process.

VII. APPROVAL

Prepared by:

\_\_\_\_\_  
RGE Con/WH&B Specialist, BLM  
Caliente Resource Area

\_\_\_\_\_  
Date

Recommended  
for Approval:

\_\_\_\_\_  
Area Manager, BLM  
Caliente Resource Area

\_\_\_\_\_  
Date

Approved by:

\_\_\_\_\_  
District Manager  
Las Vegas District

\_\_\_\_\_  
Date

Concurrence:

\_\_\_\_\_  
State Director  
Nevada State Office

\_\_\_\_\_  
Date

APPENDIX I

Maps

- Map #1 - Maps of Highland Peak HMA
- Map #2 - Home Range and Herd Use Area
- Map #3 - Studies
- Map #4 - Existing Projects
- Map #5 - Proposed Projects

R. 64 E.

R. 65 E.

R. 66 E.

R. 67 E.

R. 68 E.

MAP #1

T. 1 N.

T. 1 S.

T. 2 S.

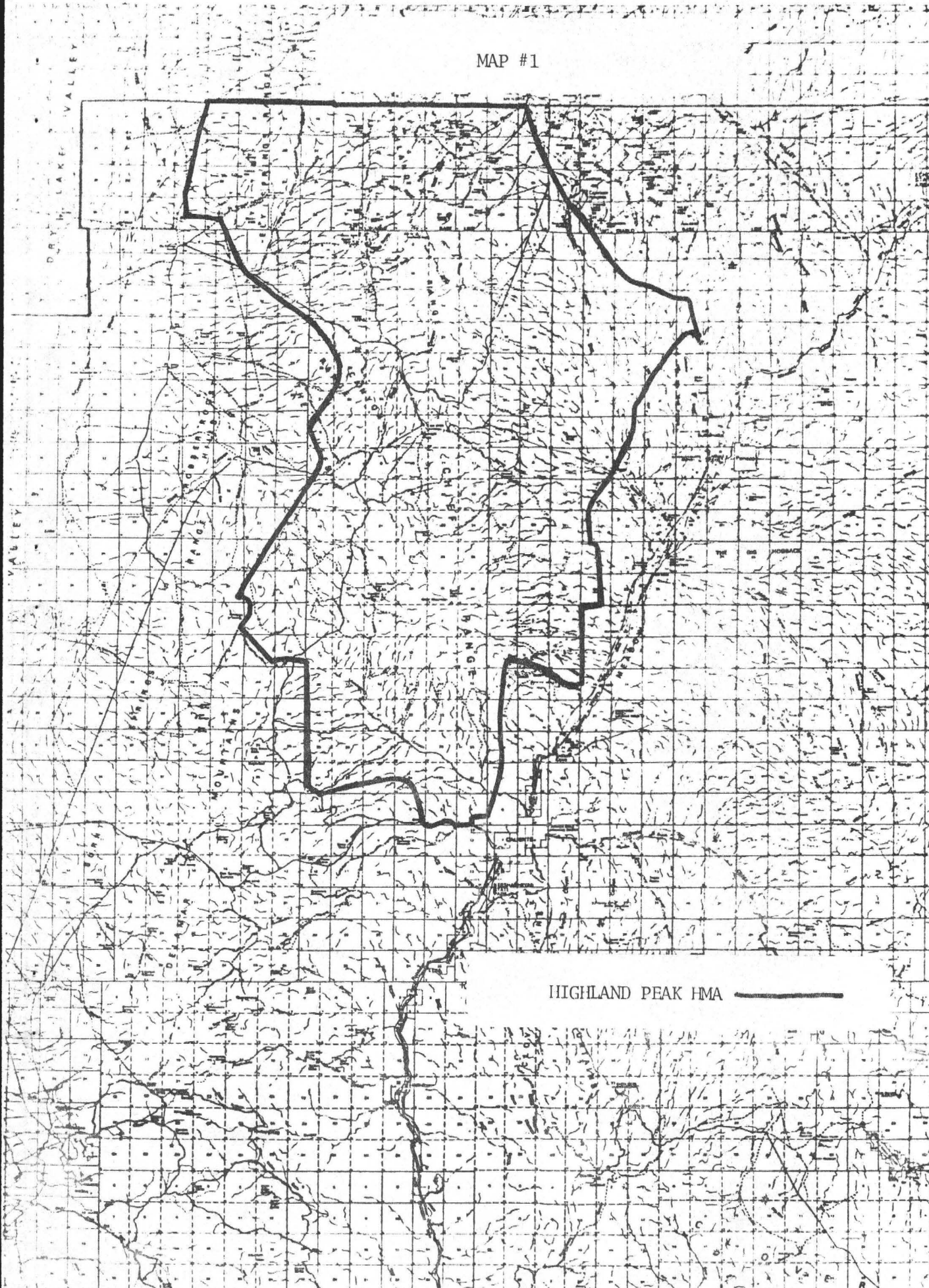
T. 3 S.

T. 4 S.

T. 5 S.

T. 6 S.

HIGHLAND PEAK HMA



R. 64 E.

R. 65 E.

R. 66 E.

R. 67 E.

R. 68 E.

MAP #2

T. 1 N.

T. 1 S.

T. 2 S.

T. 3 S.

T. 4 S.

T. 5 S.

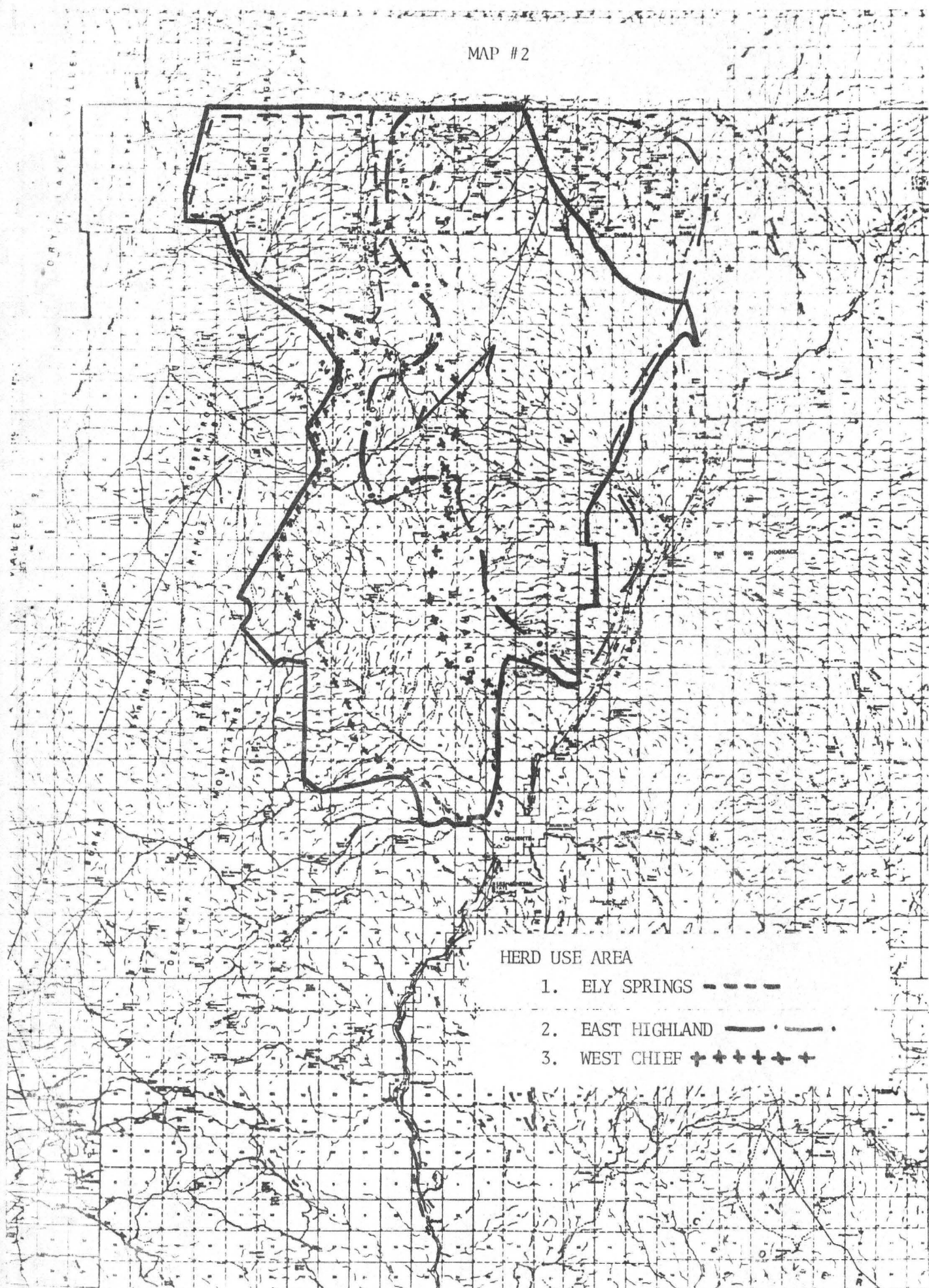
T. 6 S.

HERD USE AREA

1. ELY SPRINGS - - - - -

2. EAST HIGHLAND - - - - -

3. WEST CHIEF + + + + +



R. 64 E.

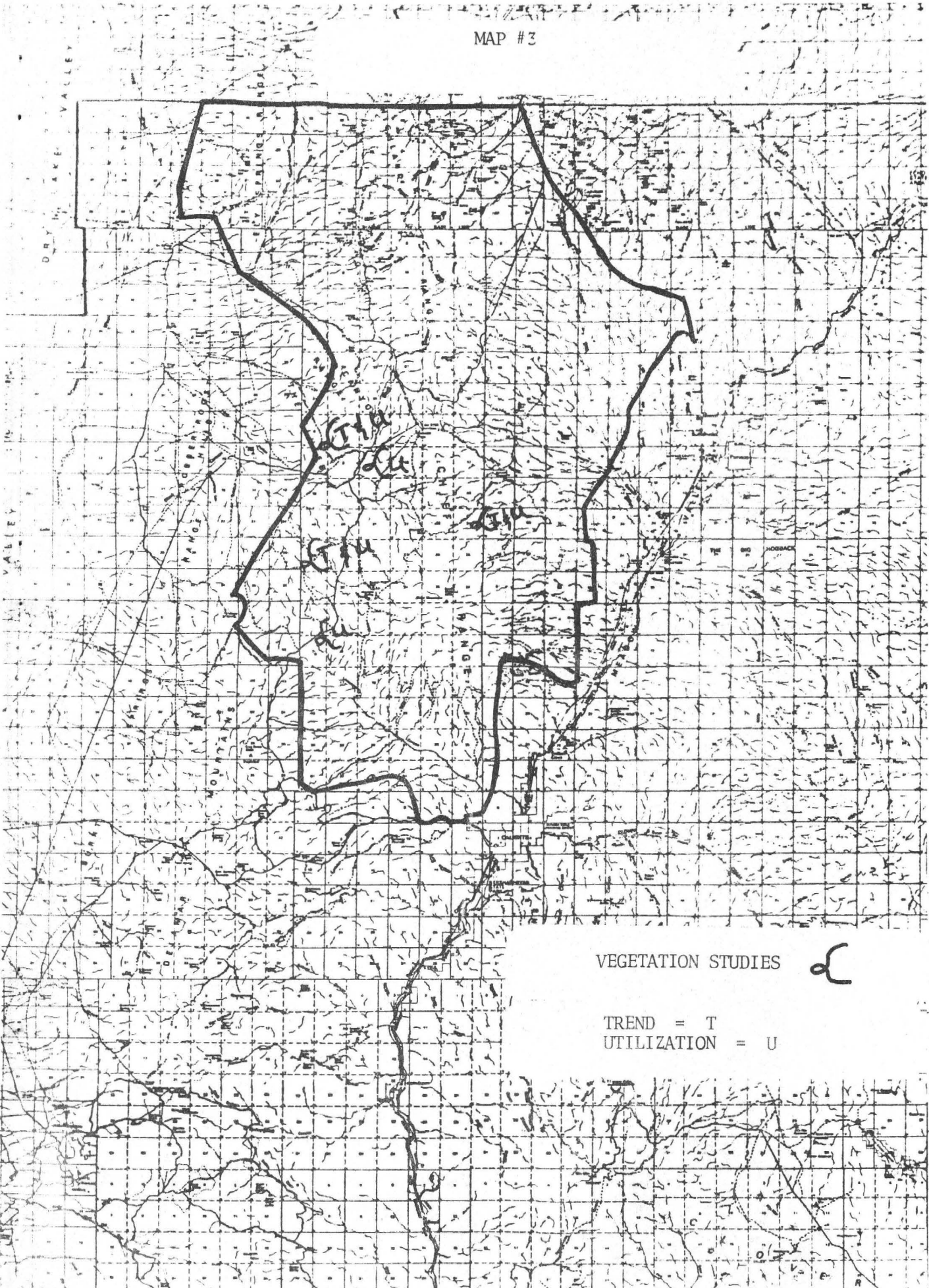
R. 65 E.

R. 66 E.

R. 67 E.

R. 68 E.

MAP #3



T. 1 N.

T. 1 S.

T. 2 S.

T. 3 S.

T. 4 S.

T. 5 S.

VEGETATION STUDIES

*d*

TREND = T

UTILIZATION = U

R. 64 E.

R. 65 E.

R. 66 E.

R. 67 E.

R. 68 E.

MAP #4

T. 1 N.

T. 1 S.

T. 2 S.

T. 3 S.

T. 4 S.

T. 5 S.

T. 6 S.

- EXISTING PROJECTS -

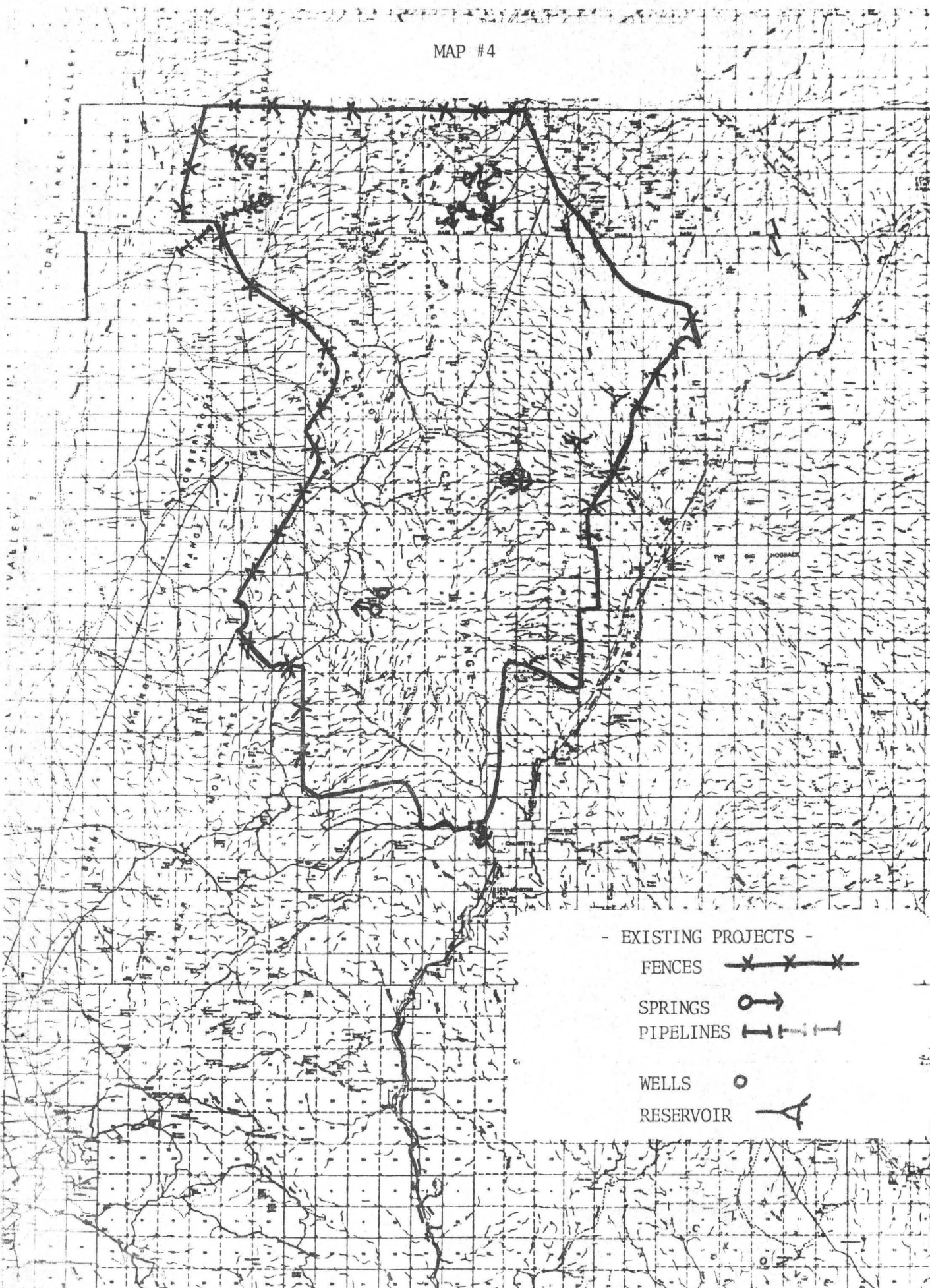
FENCES 

SPRINGS 

PIPELINES 

WELLS 

RESERVOIR 



R 64 E.

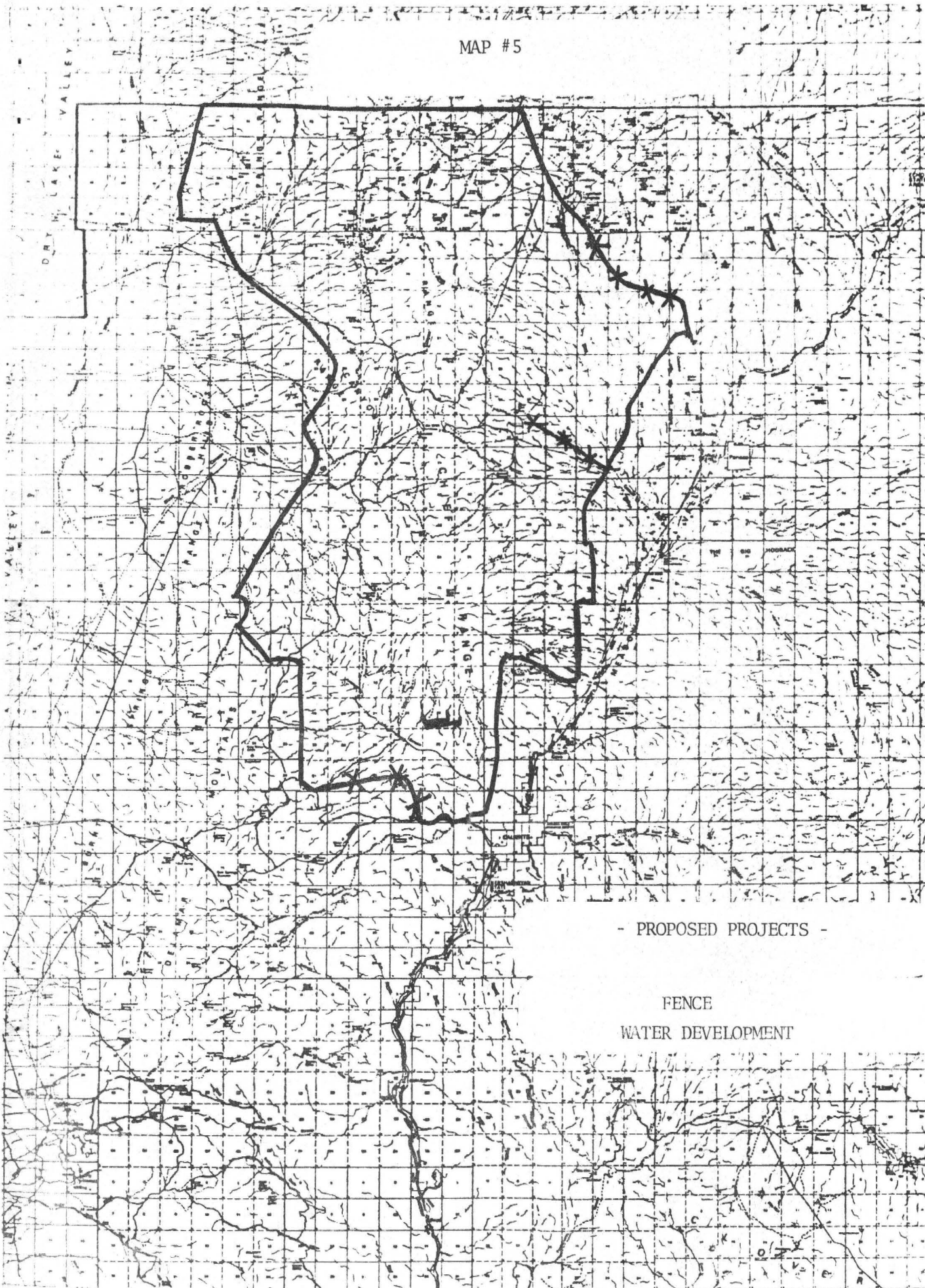
R 65 E.

R 66 E.

R 67 E.

R 68 E.

MAP #5



T. 1 N.

T. 1 S.

T. 2 S.

T. 3 S.

T. 4 S.

T. 5 S.

T. 6 S.

- PROPOSED PROJECTS -

FENCE  
WATER DEVELOPMENT



GLOSSARY

Actual Count. Censuses invariably undercount total numbers of animals per given area, those animals actually seen and counted are referred to as actual count. Hence, actual count implies that there has been no correction factor added to numbers of animals counted, which if added would reflect the total population estimates for that area.

Age Structure. The ratio of one age class to another used in determining or understanding the population dynamics and identifying future or past problems in the herd.

Allotment. An area of land where one or more operators graze their livestock. It generally consists of public lands but may include parcels of private or state-owned lands. The number of livestock and season-of-use are stipulated for each allotment. An allotment may consist of several pastures or be only one pasture.

Allotment Management Plan (AMP). A livestock grazing management plan dealing with a specific unit of rangeland, based on multiple-use resource management objectives. The AMP considers livestock grazing in relation to other uses of the range in relation to renewable resources-watershed, vegetation, and wildlife. An AMP establishes season-of-use, number of livestock to be permitted on the range, and rangeland developments needed.

Act, The. The Wild Free-Roaming Horse and Burro Protection Act of December 15, 1971, 16 U.S.C. 1331-1431.

AML. Appropriate Management Level for wild horses.

Animal Unit Month (AUM). Amount of feed or forage consumed by an animal-unit for one month.

BLM. The Bureau of Land Management.

CRMP. Lincoln County Coordinated Resource Management and Planning Committee developed to make recommendations to the BLM concerning resource management.

Carrying Capacity. The maximum number of animals possible without including damage to vegetation or related resources. It may vary from year to year on the same area due to fluctuating forage production.

Community. A group of plants and animals living in a specific region under relatively similar conditions.

GLOSSARY (Continued)

Demography. The study of vital statistics of a population.

Ecological Status. The present state of the vegetation and soil protection of an ecological site in relation to the potential natural community.

Erosion. The wearing away of the land surface by wind, running water, and other geological agents.

Enclosure. A small area set aside and protected from grazing, either to preserve representative areas in excellent range condition or to allow observation of succession on depleted rangeland without grazing.

Fecundity. Rate at which an individual produces offspring, usually expressed only for females.

Finite Rate of Increase ( ). Factor by which the population increases during each time unit.

Forage. All browse and herbaceous food that is available to grazing animals.

Grazing System. A systematic application of grazing treatments to a management unit in a prescribed sequence over recurring periods of time; the manipulation of livestock to accomplish a desired result.

Habitat. A specific set of physical conditions that surround the single species, a group of species, or large community. In wildlife management, the major components of habitat are considered to be food, water cover, and living space.

Habitat Management Plan (HMP). A written and officially approved plan for a specific geographic area of public land that identifies wildlife habitat and related objectives, establishes the sequence of actions for achieving objectives, and outlines procedures for evaluating accomplishments.

Herd. A number of wild animals of one species that remain together as a group.

Herd Management Area (HMA). That area of wild horse habitat covered by a HMAP.

Herd Management Area Plan (HMAP). A plan for management of the HMA.

GLOSSARY (Continued)

Home Range. An area that an animal or group of animals travel in pursuit of their routine activity.

Key Management Area. These are areas that may be a relatively small portion of a range selected because of its location, use, or grazing values as a monitoring point for management decisions. It is assumed that key areas, if properly selected, will reflect the overall acceptability of current grazing management over all or part of the grazing unit.

Key Species. (1) Forage species whose use serves as an indicator to the degree of use of associated species; (2) those species which must, because of their importance, be considered in the management program.

Management Framework Plan (MFP). A planning decision document which establishes for a given area of land, land-use allocations, coordination guidelines for multiple-use, and objectives to be achieved for each class of land use or protection. It is BLM's Land Use-Use Plan.

Mortality. Ratio of the number of deaths of individuals to the population, often described as a function of age.

ORV. Off-road Vehicle.

Perennial (Plant). A plant that has a life cycle of three or more years.

Public Land. Tracts of land administered by the Bureau of Land Management.

Range Condition. The current productivity of a range relative to what the range is naturally capable of producing.

Range Inventory. An itemized list of resources of a management area such as range site; range condition classes; range condition trends; range use; estimated proper stocking rates; physical developments; and natural conditions such as water, barriers, etc.

Range Trend. Change in vegetation and soil characteristics as a direct result of environmental factors, primarily climate and grazing.

Reasonable Numbers. That number of animals which the wildlife management agency is striving to maintain within a given planning unit under a multiple-use concept on a sustained yield basis.

GLOSSARY (Continued)

Riparian. Of, on, or pertaining to the bank of a river, or a pond or small water source.

Sex Ratio. The ratio existing between the number of male and female animals within a given herd, band or population.

Shrub. A relatively low-growing, much branched, many stemmed, woody, perennial plant.

Soil. The unconsolidated mineral and organic material on the immediate surface of the earth that serves as a natural medium for the growth of land plants.

Soil Associations. A group of defined and named soil units occurring together in a characteristic pattern over a geographic region.

Unit Resource Analysis (URA). A comprehensive display of physical resource data and an analysis of the current use, production, condition, and trend of the resource and the potentials and opportunities within a planning unit, including a profile of ecological values.

Utilization (Range Utilization). A degree of use of current year's plant production made by grazing animals.

Vegetative Type. A plant community with distinguishable characteristics, described by the dominant vegetation present.

Watershed. The total area above a given point on a stream that contributes water to the flow at that point.

LITERATURES CITED

- M.E. Ensminger, S.S., M.A., PhD. 1978. The Stockman's Handbook (Animal Agricultural Series). Fifth Edition. The Interstate Printers & Publishers, Inc., Danville, Illinois.
- Tueller, P.T., G. Lorain, K. Kipping, and C. Wilkie. 1972. Methods for Measuring Vegetation Changes on Nevada Rangelands. Nevada Agriculture Experiment Station Technical Bulletin No. 16.
- Franklin, I.R. 1980. Evolutionary change in small populations in M.E. Soute and B.A. Wilcox, eds. Conservation Biology: an evolutionary-ecological perspective. Sinauer Assoc., Inc., Sunderland, Mass. 395 pp.

5-18-86

# WHOA!

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## WILD HORSE ORGANIZED ASSISTANCE INC.

A Foundation for the Welfare of  
Wild Free-Roaming Horses and Burros

P. O. Box 555  
Reno, Nevada 89504

### In Memoriam

LOUISE C. HARRISON  
VELMA B. JOHNSTON, "Wild Horse Annie"

May 18, 1986

Mr. Robert Taylor, Area Manager  
Bureau of Land Management  
Post Office Box 237  
Caliente, Nevada 89008

Dear Mr. Taylor:

Thank you very much for the opportunity to comment on the Highland Peak Herd Management Area Plan, and associated Environmental Assessment. The document was difficult to track from the Caliente EIS and the RPS, and we just became aware there was an MFP amendment.

### Range page 1 (1)

How is it possible to maintain the ecological status at a static to upward trend, when page 2-3 (vegetation) states vegetation utilization and trend data for the HMA is unavailable at present? Wouldn't it have been more plausible to develop the HMA when the soil survey was completed?

### page 1 (2)

You state "Continue management and development at a level which will maintain forage at present active preference." Is present active preference different than past or future active preference?

### page 1 (3)

Are the allotment objectives consistent with the HMAP, HMP and MFP objectives? Please send WHOA the allotment plans that are within the herd management area.

### Ecological Statis page 3 (3)

It is my understanding that over time frequency indicates downward, upward, or static trends in the soil and vegetative resource. It is also my understanding that utilization, done through monitoring, determine the extent the resource is being utilized. So frequency may show a downward trend in vegetation, it is the utilization that determines how much is being consumed. You do not indicate, at least in this portion of the document, whether utilization studies have been initiated, nor identified how adjustments will be made. Will you have the ability to separate out the horse use from livestock use? If not, how will those adjustments be made?



Page two

Water page 3 (5)

Please explain why George's water or Klondike Spring are unavailable to wild horses in the herd use area? I have referred to your maps, none of which indicate which waters are which. Page 10 (b) indicates the CRMP, so I wonder why there are questions of whether the present available waters will not continue? Your words are "not guaranteed." (pg 9, c-1) If these issues could not be worked out in the CRMP, what benefit does CRMP have for wild horses?

Livestock page 4 (b)

WHOA would have extreme difficulty with interior fencing of the HMA, especially those that would inhibit the free-roaming nature of the wild horses. Obviously there are some tradeoffs, and if fencing could be designed that would not inhibit their range, we would take that into consideration. But, if wild horses, i.e. the fencing, would help facilitate livestock management, the tradeoff then would be guaranteed waters! Page 4 last paragraph states, 10,621 AUMs active livestock authorized in the HMA; however, Table II, including Rocky Hills, shows a total of 11,089 AUMs active preference. If 73% of the 402 AUMs of active preference is computed and subtracted from the 11,089, the result is 10,796 AUMs. Please explain the difference?

Wild Horses page 6 (c)

Table III does not indicate what time of the year each of the census' were done, so it is impossible to determine whether this data is comparable. Presumably consistency would lessen the underestimates you assume are occurring.

Gatherings page 7 (c)

What demographic information, i.e. sex ratio, age distribution, data were obtained from the capture?

Home Range page 8 (f)

It is certainly imperative to have seasonal use patterns before the development of AMP range improvements are implemented.

page 8 (g)

WHOA has extreme difficulty in accepting a 19.5% reproductive rate based on a one-time survey!

Recreation page 9 (8)

If ORV activities based on a case by case basis, the knowledge of seasonal use patterns, foaling season periods, should be used to determine whether that activity will impact the wild horses at that time.

Existing Projects page 9 (c)

If availability of water sources is not guaranteed under the CRMP agreement, please explain how the process benefitted wild horses. It has been my experience that CRMP has been used largely to get range improvements for the facilitation of livestock management and once those objectives are achieved there

Page three

is little incentive to live up to the agreement. It is also my understanding that BLM was not a voting member of the CRMP. It is impossible to conceive how the process could work without the agency as an active participant. The public, through tax dollars, and laws mandate the agency be the final decision-maker and represent all resource values on our public rangeland. Therefore, the agency must have a voting role within the process or the structure of the CRMP is flawed.

Page 13 (b) states an agreement will be prepared, isn't the CRMP an agreement? How does BLM propose to minimize damage to private property?

Page 10 (b) indicates implementation of intensive livestock management grazing systems without adequate knowledge of herd use patterns or the impact of these systems on the wild horses free roaming nature. WHOA feels this data must be available BEFORE the intensive systems are designed, to do otherwise would be irresponsible.

IV Management Methods (A II b Page 11-12)

Fifteen percent less than the allowable use factor is just another way of removing wild horses below the appropriate management level. As we understand it, the MFP was amended, to set an AML, that number then is the minimum number to be managed, not the maximum. Monitoring, if done as BLM states it will be done, then would show over utilization or levels over the allowable use factors. Can you explain what would happen if the 50 or even more, stayed below the allowable use factor? Would BLM reduce them anyway? How would you know if the use were horses or livestock? If livestock or sheep reach the allowable use factors will BLM reduce livestock 15% less than the allowable use factor?

How will the user be identified (page 12 (c))?

The EIS stated current numbers and monitoring, but apparently there was an amendment to the MFP, but the RPS does not reflect that amendment that I can find. Please send copy of amendment and rationale and whether this amendment was put out for public review.

Population Adjustment page 14 (f)

If I am correct the SNU (suspended non-use) was an adjudication process based on the assumption that historical production would not be available in the near future, if ever. It is then the position of WHOA, that those aums suspended may never be available unless management actions (range improvements) to rehabilitate the range are undertaken. If tax dollars are to be used to rehabilitate the rangeland, it is WHOA's opinion then that public resources should share in that rehabilitation. WHOA is not against permittees recapturing lost aums if they are below preference, using the same ratio as a basis.



Page four

Seemingly the next paragraph appears to be inconsistent with the CRMP agreement, "if monitoring demonstrates a need." Please explain how you can set an min/max number of wild horses, reduce when it gets to max., even if monitoring does not indicate a need? Somehow the CRMP agreement used current numbers for livestock and any increase or decrease will be based on monitoring; but a level was established for wild horses and those numbers will remain within that level. I don't believe that is what the public intended in its' comments on the EIS/MFP.

V Studies page 15 (A)-(1)

How does BLM propose to establish key areas within one year, if as indicated pm page 8(f), their use patterns, home ranges have not been determined? Does BLM intend to collect this data previous to the establishment of key areas and identification of key forage plant species? According to the maps in the Appendix, T & U studies are limited to two areas, one in the east highland. The majority of springs are on the northern portion of the map, yet no studies are in those areas? Are they waters not available to wild horses? Why are all the studies centralized in the left portion of the map?

Water page 16 (4)

And what will BLM do if sufficient water is not available?

page 19

I found on page 13(b) a proposal to develop a water catchment under the objective to improve physical condition. Did I miss an entire section of "proposed projects?" I couldn't find anywhere why a fence within the HMA is proposed, nor what benefit it will have on wild horses. Please clarify.

In summary, it appears there are now three levels of opportunity to set wild horse numbers, the EIS/MFP process, the CRMP process, and now the 15% less than the allowable use factor. WHOA does not accept the AML as the maximum level of wild horses, but rather the minimum, with monitoring to determine whether that level is within the allowable use factor. Nor do we support the opportunity to recapture, through tax dollar supported range improvements, the suspended non-use, without the public resources sharing in that rehabilitation. Nor do we understand why anyone, other than permittees would even suggest it.

WHOA flatly objects to current numbers for livestock and a CRMP ruse designed to reduce wild horses below a viable AML before it is even known whether the reduction is necessary.

As original member of the CRMP, WHOA deferred representation to a local group, however WHOA did not abrogate its' responsibility to the wild horses. If this Herd Management Plan is representative of the CRMP work, we will have to request notification of all future CRMP meeting dates so that we can resume WHOA representation.

Page five

Draft Environmental Assessment for Highland Peak HMAP

All comments here-to-fore pertaining to the HMAP are reiterated for the Environmental Assessment with some additions.

II Proposed Action

WHOA flatly objects to the use of current numbers and monitoring for livestock, and then the use of a min/max/ level of wild horses. The establishment of AML was to get a base from which monitoring would then determine future numbers!

Under the proposed action wild horse numbers would be kept static, despite range improvements, and livestock numbers could rise unchecked. If memory serves me correctly, the reductions in livestock numbers in the EIS prompted a critical response from permissess alleging that reductions were being based on one time surveys. Please correct me, if the same ploy is not being used with wild horse numbers in the CRMP process.

IV(C). WHOA would like to establish for the record that while less than 2% of the animals are injured during the capture process, the affects of the gathering, i.e. distance horses were run, type of capture, type of transportation, and season of capture, all contribute to a stress factor that only shows up weeks after the capture operation. WHOA is currently assessing the REAL impacts to the wild horses of capture operations. Records from Palomino Valley show a larger number of animals that must be destroyed once they get to Palomino.

In summary, WHOA has no alternative but to support Alternative A, with an addendum that wild horse would only be reduced if, under monitoring, their numbers exceeded the allowable use factor. Livestock numbers could increase to preference if their use were below the allowable use factor. Any increases above preference then would be given proportionately.

Most sincerely,

Dawn Y. Lappin (Mrs.)  
Director

cc: E. F. Spang  
David Hornbeck, Esq.  
Board of Trustees

6-2-86

# W H O A !

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WILD HORSE ORGANIZED ASSISTANCE  
INC.  
A Foundation for the Welfare of  
Wild Free-Roaming Horses and Burros

P. O. Box 555  
Reno, Nevada 89504

*JE*  
*6/2/86*

LOUISE C. HARRISON  
VELMA B. JOHNSTON, "Wild Horse Annie" May 18, 1986

Mr. Robert Taylor, Area Manager  
Bureau of Land Management  
Post Office Box 237  
Caliente, Nevada 89008

Dear Mr. Taylor:

Thank you very much for the opportunity to comment on the Highland Peak Herd Management Area Plan, and associated Environmental Assessment. The document was difficult to track from the Caliente EIS and the RPS, and we just became aware there was an MFP amendment.

Range page 1 (1)

How is it possible to maintain the ecological status at a static to upward trend, when page 2-3 (vegetation) states vegetation utilization and trend data for the HMA is unavailable at present? Wouldn't it have been more plausible to develop the HMA when the soil survey was completed?

page 1 (2)

You state "Continue management and development at a level which will maintain forage at present active preference." Is present active preference different than past or future active preference?

page 1 (3)

Are the allotment objectives consistent with the HMAP, HMP and MFP objectives? Please send WHOA the allotment plans that are within the herd management area.

Ecological Statis page 3 (3)

It is my understanding that over time frequency indicates downward, upward, or static trends in the soil and vegetative resource. It is also my understanding that utilization, done through monitoring, determine the extent the resource is being utilized. So frequency may show a downward trend in vegetation, it is the utilization that determines how much is being consumed. You do not indicate, at least in this portion of the document, whether utilization studies have been initiated, nor identified how adjustments will be made. Will you have the ability to separate out the horse use from livestock use? If not, how will those adjustments be made?



Page two

Water page 3 (5)

Please explain why George's water or Klondike Spring are unavailable to wild horses in the herd use area? I have referred to your maps, none of which indicate which waters are which. Page 10 (b) indicates the CRMP, so I wonder why there are questions of whether the present available waters will not continue? Your words are "not guaranteed." (pg 9, c-1) If these issues could not be worked out in the CRMP, what benefit does CRMP have for wild horses?

Livestock page 4 (b)

WHOA would have extreme difficulty with interior fencing of the HMA, especially those that would inhibit the free-roaming nature of the wild horses. Obviously there are some tradeoffs, and if fencing could be designed that would not inhibit their range, we would take that into consideration. But, if wild horses, i.e. the fencing, would help facilitate livestock management, the tradeoff then would be guaranteed waters! Page 4 last paragraph states, 10,621 AUMs active livestock authorized in the HMA; however, Table II, including Rocky Hills, shows a total of 11,089 AUMs active preference. If 73% of the 402 AUMs of active preference is computed and subtracted from the 11,089, the result is 10,796 AUMs. Please explain the difference?

Wild Horses page 6 (c)

Table III does not indicate what time of the year each of the census' were done, so it is impossible to determine whether this data is comparable. Presumably consistency would lessen the underestimates you assume are occurring.

Gatherings page 7 (c)

What demographic information, i.e. sex ratio, age distribution, data were obtained from the capture?

Home Range page 8 (f)

It is certainly imperative to have seasonal use patterns before the development of AMP range improvements are implemented.

page 8 (g)

WHOA has extreme difficulty in accepting a 19.5% reproductive rate based on a one-time survey!

Recreation page 9 (8)

If ORV activities based on a case by case basis, the knowledge of seasonal use patterns, foaling season periods, should be used to determine whether that activity will impact the wild horses at that time.

Existing Projects page 9 (c)

If availability of water sources is not guaranteed under the CRMP agreement, please explain how the process benefitted wild horses. It has been my experience that CRMP has been used largely to get range improvements for the facilitation of livestock management and once those objectives are achieved there

Page three

is little incentive to live up to the agreement. It is also my understanding that BLM was not a voting member of the CRMP. It is impossible to conceive how the process could work without the agency as an active participant. The public, through tax dollars, and laws mandate the agency be the final decision-maker and represent all resource values on our public rangeland. Therefore, the agency must have a voting role within the process or the structure of the CRMP is flawed.

Page 13 (b) states an agreement will be prepared, isn't the CRMP an agreement? How does BLM propose to minimize damage to private property?

Page 10 (b) indicates implementation of intensive livestock management grazing systems without adequate knowledge of herd use patterns or the impact of these systems on the wild horses free roaming nature. WHOA feels this data must be available BEFORE the intensive systems are designed, to do otherwise would be irresponsible.

#### IV Management Methods (A II b Page 11-12)

Fifteen percent less than the allowable use factor is just another way of removing wild horses below the appropriate management level. As we understand it, the MFP was amended, to set an AML, that number then is the minimum number to be managed, not the maximum. Monitoring, if done as BLM states it will be done, then would show over utilization or levels over the allowable use factors. Can you explain what would happen if the 50 or even more, stayed below the allowable use factor? Would BLM reduce them anyway? How would you know if the use were horses or livestock? If livestock or sheep reach the allowable use factors will BLM reduce livestock 15% less than the allowable use factor?

How will the user be identified (page 12 (c))?

The EIS stated current numbers and monitoring, but apparently there was an amendment to the MFP, but the RPS does not reflect that amendment that I can find. Please send copy of amendment and rationale and whether this amendment was put out for public review.

#### Population Adjustment page 14 (f)

If I am correct the SNU (suspended non-use) was an adjudication process based on the assumption that historical production would not be available in the near future, if ever. It is then the position of WHOA, that those aums suspended may never be available unless management actions (range improvements) to rehabilitate the range are undertaken. If tax dollars are to be used to rehabilitate the rangeland, it is WHOA's opinion then that public resources should share in that rehabilitation. WHOA is not against permittees recapturing lost aums if they are below preference, using the same ratio as a basis.

Page four

Seemingly the next paragraph appears to be inconsistent with the CRMP agreement, "if monitoring demonstrates a need." Please explain how you can set an min/max number of wild horses, reduce when it gets to max., even if monitoring does not indicate a need? Somehow the CRMP agreement used current numbers for livestock and any increase or decrease will be based on monitoring; but a level was established for wild horses and those numbers will remain within that level. I don't believe that is what the public intended in its' comments on the EIS/MFP.

V Studies page 15 (A)-(1)

How does BLM propose to establish key areas within one year, if as indicated pm page 8(f), their use patterns, home ranges have not been determined? Does BLM intend to collect this data previous to the establishment of key areas and identification of key forage plant species? According to the maps in the Appendix, T & U studies are limited to two areas, one in the east highland. The majority of springs are on the northern portion of the map, yet no studies are in those areas? Are they waters not available to wild horses? Why are all the studies centralized in the left portion of the map?

Water page 16 (4)

And what will BLM do if sufficient water is not available?

page 19

I found on page 13(b) a proposal to develop a water catchment under the objective to improve physical condition. Did I miss an entire section of "proposed projects?" I couldn't find anywhere why a fence within the HMA is proposed, nor what benefit it will have on wild horses. Please clarify.

In summary, it appears there are now three levels of opportunity to set wild horse numbers, the EIS/MFP process, the CRMP process, and now the 15% less than the allowable use factor. WHOA does not accept the AML as the maximum level of wild horses, but rather the minimum, with monitoring to determine whether that level is within the allowable use factor. Nor do we support the opportunity to recapture, through tax dollar supported range improvements, the suspended non-use, without the public resources sharing in that rehabilitation. Nor do we understand why anyone, other than permittees would even suggest it.

WHOA flatly objects to current numbers for livestock and a CRMP ruse designed to reduce wild horses below a viable AML before it is even known whether the reduction is necessary.

As original member of the CRMP, WHOA deferred representation to a local group, however WHOA did not abrogate its' responsibility to the wild horses. If this Herd Management Plan is representative of the CRMP work, we will have to request notification of all future CRMP meeting dates so that we can resume WHOA representation.

Page five

Draft Environmental Assessment for Highland Peak HMAP

All comments here-to-fore pertaining to the HMAP are reiterated for the Environmental Assessment with some additions.

II Proposed Action

WHOA flatly objects to the use of current numbers and monitoring for livestock, and then the use of a min/max/ level of wild horses. The establishment of AML was to get a base from which monitoring would then determine future numbers!

Under the proposed action wild horse numbers would be kept static, despite range improvements, and livestock numbers could rise unchecked. If memory serves me correctly, the reductions in livestock numbers in the EIS prompted a critical response from permissess alleging that reductions were being based on one time surveys. Please correct me, if the same ploy is not being used with wild horse numbers in the CRMP process.

IV(C). WHOA would like to establish for the record that while less than 2% of the animals are injured during the capture process, the affects of the gathering, i.e. distance horses were run, type of capture, type of transportation, and season of capture, all contribute to a stress factor that only shows up weeks after the capture operation. WHOA is currently assessing the REAL impacts to the wild horses of capture operations. Records from Palomino Valley show a larger number of animals that must be destroyed once they get to Palomino.

✓ In summary, WHOA has no alternative but to support Alternative A, with an addendum that wild horse would only be reduced if, under monitoring, their numbers exceeded the allowable use factor. Livestock numbers could increase to preference if their use were below the allowable use factor. Any increases above preference then would be given proportionately.

Most sincerely,

Dawn Y. Lappin (Mrs.)  
Director

cc: E. F. Spang ✓  
David Hornbeck, Esq.  
Board of Trustees

9/10/86



# United States Department of the Interior

## BUREAU OF LAND MANAGEMENT

Caliente Resource Area

P. O. Box 237

Caliente, NV 89008

IN REPLY  
REFER TO:

WHOA  
4700  
(NV-057.7)

SEP 10 1986

(702) 726-3141

WHOA  
ATTN: Dawn Y. Lappin, Director  
P.O. Box 555  
Reno, NV 89504

Dear Mrs. Lappin:

Thank you for your comments on the Highland Peak Herd Management Area Plan (HMAP) and Environmental Assessment. We are taking your suggestions into account in finalizing the HMAP. The following comments are in response to the questions you asked in your letter dated May 18, 1986.

Question:

"Range page 1 (1):

How is it possible to maintain the ecological status at a static to upward trend, when page 2-3 (vegetation) states vegetation utilization and trend data for the HMA is unavailable at present? Wouldn't it have been more plausible to develop the HMA when the soil survey was completed?

Answer:

A static trend can be maintained using already installed trend studies plus additional ones to monitor change. Analysis of the cover/frequency plots will tell us if there is a change in the frequency of occurrence of plant species. When ecological status is determined (through completion of order three soil surveys) we will be able to analyze the data to determine if changes in ecological status have occurred. Lack of complete data should not delay development of HMAP's since these documents are dynamic and are meant to be updated as information becomes available.



Question:

"Page 1 (2):

You state "Continue management and development at a level which will maintain forage at present active preference." Is present active preference different than past or future active preference?"

Answer:

The HMAP is being modified to reflect the following definition concerning the licensing of livestock on public lands. Grazing preference is the total number of AUMs listed on a grazing permit. It consists of the authorized grazing use (present active use) plus the suspended non-use (preference temporarily withheld from active use).

Question:

"Page 1 (3)

Are the allotment objectives consistent with the HMAP, HMP and MFP objectives? Please send WHOA the allotment plans that are within the herd management area."

Answer:

MFP is the only planning document prepared thus far. HMAP objectives are consistent with the plan as written. General objectives for allotments are identified in the 1985 Rangeland Program Summary Update, Caliente Resource Area. (Enclosed).

Question:

"Ecological Status Page 3 (3)

It is my understanding that over time frequency indicates downward, upward, or static trends in the soil and vegetative resource. It is also my understanding that utilization, done through monitoring, determine the extent the resource is being utilized. So frequency may show a downward trend in vegetation, it is the utilization that determines how much is being consumed. You do not indicate, at least in this portion of the document, whether utilization studies have been initiated, nor identified how adjustments will be made. Will you have the ability to separate out the horse use from livestock use? If not, how will those adjustments be made?"

Answer:

Utilization has been added to the Ecological Status and Trend Section on page three of the HMAP. Separation of wild horse use adjustments will be discussed later in the document. Livestock use can be determined by conducting utilization studies prior to livestock turn out and after the livestock has been removed. Adjustments to the wild horse population are addressed in the population adjustment section on page 14 of the HMAP.

Question:

Water Page 3 (5)

Please explain why George's water or Klondike Spring are unavailable to wild horses in the herd use area? I have referred to your maps, none of which indicate which waters are which. Page 10 (b) indicates the CRMP, so I wonder why there are questions of whether the present available waters will not continue? Your words are "not guaranteed." (Pg. 9, c-1). If these issues could not be worked out in the CRMP, what benefit does CRMP have for wild horses?

Answer:

The reason water is not available is that George's water is an old mine shaft and the water needs to be pumped out to be available. Klondike Spring has a very low flow rate and the entire portion of available water is fenced to protect the source from trampling which could reduce the already limited flow. Both waters are base waters and the amount of water remaining for wild horses may not be enough after satisfying the permittees water right. Therefore, availability of base water sources in the future will require extra coordination by BLM, possibly through the CRMP process, to assure that water remains available for wild horses. The document has been modified to reflect the above statement. The CRMP process has benefitted wild horse. Through CRMP wild horse numbers were modified to a 50-head Appropriate Management Level (AML) from the 20 head established during earlier CRMP meetings and 39 head established in MFP (prior to amendment).

Question:

"Livestock Page 4 (b)

WHOA would have extreme difficulty with interior fencing of the HMA, especially those that would inhibit the free-roaming nature of the wild horses. Obviously there are some tradeoffs, and if fencing could be designed that would not inhibit their range, we would take that into consideration. But, if wild horses, i.e., the fencing, would help facilitate livestock management, the tradeoff then would be guaranteed waters! Page 4 last paragraph states, 10,621 AUMs active livestock authorized in the HMA; however, Table II, including Rocky Hills, shows a total of 11,089 AUMs active preference. If 73% of the 402 AUMs of active preference is computed and subtracted from the 11,089, the result is 10,796 AUMs. Please explain the difference?"

Answer:

Table II, including Rocky Hills, totals 11,397 AUMs authorized grazing use. If 73% of the 402 AUMs in Pioche and 82% of 3,704 AUMs of Highland Peak is computed and subtracted from 11,397, the result is 10,621, as stated in the HMAP.

Question:

"Wild Horses Page 6 (c)

Table III does not indicate what time of the year each of the census' were done, so it is impossible to determine whether this data is comparable. Presumably consistency would lessen the underestimates you assume are occurring."

Answer:

The census dates have been added to Table III of the document.

Question:

"Gatherings Page 7 (c)

What demographic information, i.e., sex ratio, age distribution, data were obtained from the capture?"

Answer:

Horses captured were aged, sexed, and their color determined. Data is available in the Caliente Resource Area Office.

Question:

Page 8 (g)

WHOA has extreme difficulty in accepting a 19.5% reproductive rate based on a one-time survey!"

Answer:

A 19.5% reproductive rate was determined by the following formula; and does not take into count any mortality.

$$\text{Reproductive Rate} = \frac{\text{Number Animals 0-1 years old}}{\text{Number Animals 1 year of age and older.}}$$

As in the case of the 1984 census there were eight foals and 41 adults. This reproductive rate was provided for information only. Additional data will be added to the Caliente Resource Area files in the future as it becomes available.

Question:

"Existing Projects Page 9 (c)

If availability of water sources is not guaranteed under the CRMP agreement, please explain how the process benefitted wild horses. It has been my experience that CRMP has been used largely to get range improvements for the facilitation of livestock management and once those objectives are achieved there is little incentive to live up to the agreement. It is also my understanding that BLM was not a voting member of the CRMP. It is impossible to conceive how the process could work without the agency as an active participant. The public, through tax dollars, and laws mandate the agency be the final decision-maker and represent all resource values on our public rangeland. Therefore, the agency must have a voting role within the process or the structure of the CRMP is flawed."

Answer:

Through CRMP, wild horse numbers were modified to 50 head from the 20 head established during earlier CRMP meetings and the 39 head maximum number that was established in Management Framework Planning MFP (prior to the MFP amendment). Establishing an Appropriate Management Level (AML) was the purpose of this particular CRMP meeting. If through development of the HMAP and implementation certain issues cannot be resolved then the CRMP process will be used again.

BLM role within the Caliente Resource Area in relation to the CRMP process is that the BLM Authorized Officer would be present at CRMP meetings to represent the BLM. His responsibility is to provide guidance so that actions being considered by the CRMP committee

are within the scope of current BLM policy and regulations. The goal was to reach agreement through consensus. The Authorized Officer does have a vote in the process, however, because BLM is the final decision maker on actions recommended by CRMP, BLM has abstained from voting at CRMP meetings to ensure our roll was to provide guidance to the process instead of controlling or pre-determining the outcome of the process.

Question:

"Page 13 (b) states an agreement will be prepared, isn't the CRMP an agreement? How does BLM propose to minimize damage to private property?"

Answer:

The CRMP process is used to assist in resolving issues and attaining agreement. The particular agreement you refer to is with a private land owner for the use of a spring located on his private property. Under these circumstances the CRMP Committee would not normally be involved in developing the agreement. The BLM proposes to minimize damage to private property by maintaining wild horse numbers (using the spring source on private property) at that level which is compatible with the amount of water being produced. Fencing other private property will also be considered but may be outside our authority to assist with due to the State's open Range laws. Details will be worked out at a later date to the mutual agreement of both parties.

Question:

"IV Management Methods (A II b Page 11-12)

Fifteen percent less than the allowable use factor is just another way of removing wild horses below the appropriate management level. As we understand it, the MFP was amended, to set an AML, that number then is the minimum number to be managed, not the maximum. Monitoring, if done as BLM states it will be done, then would show over utilization or levels over the allowable use factors. Can you explain what would happen if the 50 or even more, stayed below the allowable use factor? Would BLM reduce them anyway? How would you know if the use were horses or livestock? If livestock or sheep reach the allowable use factors will BLM reduce livestock 15% less than the allowable use factor?"

Answer:

The MFP was amended to set the wild horse AML through the CRMP process. Adjustments to this interim AML will be made only when monitoring indicates a need. However, during the interim all herbivores will be maintained at a specific level until monitoring studies are analyzed and results indicate a need for adjustments.

The results of monitoring studies may indicate a need for internal adjustments but overall the AML would remain the same. If internal adjustment is determined necessary, then wild horses overutilizing a specific key area may be removed down to a level that would provide use on that key area of 15% less than the allowable use factors established for horses. Wild horse populations in other areas of the HMA might well be allowed to increase. This will maintain an overall AML of 50 head as agreed to in CRMP.

Utilization studies prior to livestock turn out and removal compared to year-round horse use will aid in identifying use by each type of animal. The amount of reduction for livestock will vary depending on the degree that animals exceed the allowable use factors.

Question:

"How will the user be identified (Page 12 (c)? The EIS stated current numbers and monitoring, but apparently there was an amendment to the MFP, but the RPS does not reflect that amendment that I can find. Please send copy of amendment and rationale and whether this amendment was put out for public review."

Answer:

Utilization prior to livestock turn out and again after they are removed may be necessary to identify use for each class of animal using the area.

MFP was not amended but changed as a result of public comments. On March 9, 1979 the proposed draft MFP-III Decisions were sent out for public review and comments. On February 29, 1980 the "Intended Decisions" were issued. As a result of public comments, changes to the "Intended Decisions" were made and the final MFP-III Decisions were signed by the Nevada State Director on November 12, 1981, with the Director of BLM giving his concurrence on February 26, 1982.

Question:

"Population Adjustment Page 14 (f)

If I am correct the SNU (suspended non-use) was an adjudication process based on the assumption that historical production would not be available in the near future, if ever. It is then the position of WHOA, that those aums suspended may never be available unless management actions (range improvements) to rehabilitate the range are undertaken. If tax dollars are to be used to rehabilitate the rangeland, it is WHOA's opinion then that public resources should share in that rehabilitation. WHOA is not against permittees recapturing lost aums if they are below preference, using the same ratio as a basis.

Seemingly the next paragraph appears to be inconsistent with the CRMP agreement, "if monitoring demonstrates a need." Please explain how you can set an min/max number of wild horses, reduce when it gets to max., even if monitoring does not indicate a need? Somehow the CRMP agreement used, current numbers for livestock and any increase or decrease will be based on monitoring; but a level was established for wild horses and those numbers will remain within that level. I don't believe that is what the public intended in its' comments on the EIS/MFP."

Answer:

The AML is the optimum number of wild horses to be managed for, as is Grazing Preference for livestock, until monitoring indicates the need or opportunity for adjustments. Therefore, during the interim both livestock and wild horse population would be maintained at a specific level (AML for horses, authorized grazing use for livestock) until analysis of monitoring data indicates a need for adjustments. Adjustments of the AML would then be made proportionately to livestock (using Grazing Preference) and to wild horses (using AML based on actual count).

Question:

"V Studies Page 15 (A)-(1)

How does BLM propose to establish key areas within one year, if as indicated on page 8(f), their use patterns, home ranges have not been determined? Does BLM intend to collect this data previous to the establishment of key areas and identification of key forage plant species? According to the maps in the Appendix, T & U studies are limited to two areas, one in the east highland. The majority of springs are on the northern portion of the map, yet no studies are in those areas? Are they waters not available to wild horses? Why are all the studies centralized in the left portion of the map?"

Answer:

Additional key areas will be selected and studies installed as outlined in the HMAP. Key Areas will be located based on what information we have of animal use patterns. The Highland Peak HMA plan is designed for the purpose of obtaining additional information about the wild horses populating the area and implementing of a management program. As stated on page three of the HMAP, waters located in the northern end of the HMAP are available to wild horses. Studies, as necessary, will be placed in this area. There are studies that exist within the HMA now. These studies are used to monitor dual use by wild horses and livestock, and were installed where the majority of the livestock use occurs. Studies consist of utilization, trend and cover.

Question:

"Water Page 16 (4)

And what will BLM do if sufficient water is not available?"

Answer:

The management methods section and Removal Section of the HMAP have been amended to reflect your concerns. The BLM will have the option to haul water to animals, remove and relocate them within the HMA and/or placement in the adoption program. The ultimate intention would be to provide sufficient water for the AML through development of additional waters (i.e., the proposed water catchment).

Question:

"Page 19"

"I found on page 13(b) a proposal to develop a water catchment under the objective to improve physical condition. Did I miss an entire section of "proposed projects?" I couldn't find anywhere why a fence within the HMA is proposed, nor what benefit it will have on wild horses. Please clarify."

Answer:

There are no new fences proposed in the HMA. The fences you refer to are approved livestock management projects and the HMAP has been modified to reflect this. Projects that are necessary to help meet the objectives of the Highland Peak HMAP are described in the management



section. The purpose of the identified projects is to help achieve the listed objectives, (i.e., achieve a desired physical condition for wild horses of good, etc.) through developments of water.

Hopefully we have answered all your questions. We will give the additional comments that you have made full consideration and will send you a copy when HMAP is finalized. If you have additional concerns or questions, please feel free to contact Phillip Seegmiller at this office.

Sincerely,



*Curtis G. Tucker*

Curtis G. Tucker  
Area Manager

Enclosures

1980