

Meadow Valley

0-29-91

W H O A

WILD HORSE ORGANIZED ASSISTANCE

P.O. BOX 555

RENO, NEVADA 89504

(702) 851-4817

BOARD OF TRUSTEES

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JACK C. McELWEE

GORDON W. HARRIS

In Memoriam

LOUISE C. HARRISON

VELMA B. JOHNSTON, "Wild Horse Annie"

GERTRUDE BRONN

October 29, 1991

Runore Wycoff, Area Manager
Stateline Resource Area
BLM - Las Vegas District Office
4765 Vegas Drive
P.O. Box 26569
Las Vegas, Nevada 89126

Dear Ms. Wycoff,

Thank you for the opportunity to comment on the Meadow Valley-Arrow Canyon-Delamar (MAD) Habitat Management Plan and Environmental Assessment.

We fully support the proposed HMP. We are concerned that an increase in bighorn sheep numbers within the areas allowed to be used by wild horses will impact the ability for wild horses to fully utilize the available AUM's within their herd boundary. Moreso with the projected development of waters that would improve the wild horse distribution within their allotment.

With the potential for overlap between wild horses and bighorn sheep there should be a monitoring program implemented at the onset to determine if a conflict is arising.

In the EA you identify the cumulative impacts of bighorn sheep on wildlife, visual, wilderness, recreation, vegetation, and soil. The cumulative impacts of bighorn sheep on wild horses has not been included in VI. Nor have you included the cumulative impacts of bighorn sheep in Meadow Valley at all. What is going to be the impact of 252 additional animals on wild horse forage in Delamar? We ask the same question of Meadow Valley but since the increase in numbers has not been stated, we cannot determine the effect.

Under VI.(d) it states that with an anticipated increase of bighorn sheep you are projecting a potential of 34 additional bighorn tags being issued, with a projected 1,020 hunter related visitor days to the HMA's. How will this affect the wild horse herds in their allowed herd use area's? The cumulative impacts of this action needs to be addressed.

We strongly suggest that when the Meadow Valley-Arrow Canyon-Delamar HMP is finalized that the Nevada Department of Wildlife institute a hunter education program as to the legitimate other uses of the range.

In conclusion, by reviewing these documents it is apparent that the BLM's objectives in setting wild horse numbers in based on the assumptions that the Bureau's setting of those numbers

Runore Wycoff, Area Manager
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could be done administratively or through the CRMP process. Demar Dahl and IBLA decisions have stated that wild horses will be managed for a thriving ecological balance determined by monitoring. The land use plans must be amended to reflect the decisions that monitoring establish wild horse numbers. Therefore the assumption that numbers based on those pre-IBLA documents will be maintained at those levels is innacurate.

We would like to request a written response to our questions.

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

Sincerely,

Dawn Y. Lappin
by CS

DAWN Y. LAPPIN
Director

Meadow Valley

m

11-21-91

IN REPLY REFER TO:



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

CALIENTE RESOURCE AREA

P.O. Box 237

Caliente, Nevada 89008

4700
(NV-055.11)

(702) 726-3141

NOV 21 1991

Catherine Barcomb
Commission for the
Preservation of Wild Horses
Stewart Facility
Capitol Complex
Carson City, Nevada 89710

Dear Ms. Barcomb:

Thank you for your response to the Meadow Valley-Arrow Canyon-Delamar Habitat Management Plan and Environmental Assessment.

In regards to your question on the current status of our monitoring program for area's containing wild horses that are affected by the HMP, there are two herd management areas that overlap with the Delamar Habitat Management Area. Approximately 800 acres overlap with the Delamar Mountain Herd Management Area on the northern tip of the Delamar Mountains and approximately 13,700 acres overlaps with the Meadow Valley Herd Management Area on the east side of the Meadow Valley Mountains. Currently there are two utilization monitoring key areas in the Meadow Valley Herd Management overlap area and none in the Delamar Herd Management overlap area. Utilization studies in the Meadow Valley Herd Management Area show slight use at the key areas. Should future circumstances warrant further studies, the necessary studies will be implemented.

The reason why wild horses have not increased in these areas is due to the limited availability of water and the inaccessibility of the excess forage to wild horses because of the rugged terrain. Wild horses currently use all the waters available to them and there is no real potential to develop further waters. Wild horses in the Meadow Valley Herd Management Area use livestock waters and the Meadow Valley Wash as water sources. Horses in the Delamar Herd Management Area use waters located outside of the habitat management area. Bighorn sheep can use these areas because they are adapted to living in very rugged terrain and arid conditions.

Again thank you for your comments. If you have any questions, please feel free to call Kyle Teel, at the number above.

Sincerely,

Curtis G. Tucker

Curtis G. Tucker
Area Manager