



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Ely District Office
HC 33 Box 33500
Ely, Nevada 89301-9408



IN REPLY REFER TO:

4130 (NV-047)

FEB 09 1984

CERTIFIED MAIL NO. P 313 269 880
RETURN RECEIPT REQUESTED

Dan Russell
c/o Tom Van Horne
2991 B Gold Canal Drive
Rancho Cordova, CA 95670

NOTICE OF PROPOSED FULL FORCE AND EFFECT MULTIPLE USE DECISION FOR THE WARM SPRINGS ALLOTMENT

BACKGROUND INFORMATION:

The Resource Management Plan/Environmental Impact Statement and Record of Decision for the Egan Resource Area were issued in September, 1984 and February, 1987, respectively. The Egan Rangeland Program Summary was issued in May of 1988. These documents guide the management of public lands within the Warm Springs Allotment. The Egan Resource Area Record of Decision, dated February 1987, states in pertinent part:

"Monitoring studies will be used to determine if adjustments in livestock numbers are necessary...All vegetation will be managed for those successional stages which would best meet the objective of this proposed plan..." (short term objectives) "Future adjustments in livestock use will be based on data provided through the rangeland monitoring program." (long term objective) "Implementation [of the range management program] will take place through coordination, consultation, and cooperation. Actions could include, but will not be limited to, change in seasons-of-use, change in livestock numbers, correction of livestock distribution problems, alteration of the number of wild horses, development of range improvements, and taking site-specific measures to achieve improvements in wildlife habitat."

Monitoring studies were initially established in 1981 and have been conducted periodically since that time. In accordance with Bureau policy and regulations, this data has been analyzed and evaluated in order to determine progress in meeting management objectives for the Warm Springs Allotment. Input was received from the Commission for the Preservation of Wild Horses and Burros, Wild Horse Organized Assistance, the Nevada Division of

Wildlife, U.S. Fish and Wildlife Service, and the N-4 Grazing Board, via a range consulting firm. See Appendix 1 for the land use plan objectives covering livestock, wild horses, and wildlife. These objectives are in conformance with and formulated to accomplish the Egan Resource Management Plan multiple use objectives as they relate to all grazing use on the Warm Springs Allotment.

BASED ON THE EVALUATION OF MONITORING DATA FOR THE WARM SPRINGS ALLOTMENT, RECOMMENDATIONS FROM DISTRICT STAFF, AND INPUT RECEIVED THROUGH CONSULTATION, COORDINATION, AND COOPERATION FROM THE PERMITTEE AND PUBLIC INTEREST GROUPS, THE PROPOSED DECISION IS AS FOLLOWS:

The analysis of monitoring data has revealed that the multiple use objectives for the Warm Springs Allotment are not being met, and in fact, significant resource deterioration is taking place throughout portions of the allotment, exemplified by irreparable damage to the ecological status of major plant communities. Data analysis shows that combined use by livestock and wild horses is the main cause of the resource deterioration. This analysis also shows that the existing management of wildlife does not contribute to the failure in meeting these multiple use objectives. Therefore, this decision proposes changes in livestock and wild horse use and not to wildlife use. This decision also establishes the appropriate management level (AML) for that portion of the Buck and Bald Herd Management Area (HMA) within the Warm Springs Allotment.

Due to the severity of the resource deterioration, to the point of irreparable damage to portions of the area's natural ecological balance, it is my intent to place the Final Decision in full force and effect in accordance with 43 CFR 4160.3(c).

LIVESTOCK MANAGEMENT DECISION

In accordance with 43 CFR 4110.3, 4110.3-2(b) and (c), 4130.6-1(a) the authorized livestock active use shall be 7,744 AUMs with 16,799 AUMs placed in suspended non-use. The authorized active use shall become effective during the 1994 grazing year following issuance of the Final Multiple Use Decision for the Warm Springs Allotment.

From (Existing permits):
Dan Russell: Warm Springs (0606)

Number	Kind	Period of Use	%PL	AUMs	
				Active	Susp
2000	Cattle	03/01 - 02/28	100	23995	0

To:
Dan Russell: Warm Springs (0606)

Cattle preference (AUMs):

Use Area	Period of Use	AUMs	
		Active	Sus.
Buck and Bald	04/01 - 08/01	2269	7377
Newark Valley	08/01 - 04/15	357	867
Diamond Mountain	04/15 - 10/15	264	0
Ruby Valley	04/15 - 10/15 or 10/15 - 04/15*	840	0
Long Valley	10/15 - 04/15	3088	7723
Long Valley Wash	10/15 - 04/15	378	832
Julian Seeding	04/15 - 10/31	227	0
West Bald Seeding	04/15 - 10/31	321	—
	Total**	7744	16,799

A. Livestock use will be authorized by use area and will be in accordance with the period of use and active preference for each of the eight use areas. (Refer to Map 3, Livestock Use Areas in the Warm Springs Evaluation)

B. Livestock use in the Ruby Valley Use Area will be either spring/summer/fall (4/15 - 10/15) or winter (10/15 - 4/15) but not both in the same growing season.

C. The new livestock preference on the Warm Springs Allotment is as follows:

Total Preference.....24,543 AUMs
Active Preference.....7,744 AUMs
Suspended Preference...16,799 AUMs

As part of the decision the allotment has been divided into eight separate use areas, including the Julian and West Bald Seedings which were adjudicated during the decision process. The Julian and West Bald Seedings have been adjudicated at 227 AUMs and 321 AUMs respectively; this adds a total of 548 AUMs to the total original preference of 23,995 which gives a new total preference of 24,543.

In accordance with 43 CFR 4130.6-2, the following terms and conditions will be included in the Russell grazing permit for the Warm Springs Allotment:

1. No salt or supplements will be allowed within 1/2 mile of water sources or in winterfat vegetation.
2. In order to maintain animal distribution in the Long Valley Use Area all functioning wells will be pumped on a regular basis throughout the winter. Cattle

moved into the valley will be split up and distributed as equally as possible to various water sources rather than pushed over Buck Pass and allowed to drift.

3. Livestock use in the Long Valley Wash Use Area will be contingent on the availability of adequate stockwater.
4. The Julian and West Bald Seedings will be used and licensed separately for spring/summer/fall cattle use (4/15 - 10/31). If spring use is made prior to 6/1 it will be alternated between the two seedings from year to year.

RATIONALE:

The analysis and evaluation of available monitoring data indicates that the current stocking rate and management practices must be modified to meet the multiple use management objectives for the Warm Springs Allotment as identified in Appendix I. The data indicates that 7,744 AUMs are available for livestock, with 16,799 AUMs in suspended non-use. Because of the severity of the resource damage throughout the allotment, the (full) final reduction will be implemented. This reduction and increased intensity of management will provide needed rest during critical spring growth, increase productivity, and result in the attainment of the multiple use objectives. These actions are required to prevent further deterioration of the rangeland and to avoid further irreparable damage to the natural ecological balance of the area's vegetative resource.

AUTHORITY: The authority for this decision is contained in Title 43 of the Code of Federal Regulations, which states in pertinent part:

4100.0-8: "The authorized officer shall manage livestock grazing on public lands under the principle of multiple use and sustained yield, and in accordance with applicable land use plans. Land use plans shall establish allowable resource uses (either singly or in combination), related levels of production or use to be maintained, areas of use, and resource condition goals and objectives to be obtained. The plans also set forth program constraints and general management practices needed to achieve management objectives. Livestock grazing activities and management actions approved by the authorized officer shall be in conformance with the land use plan as defined at 43 CFR 1601.0-5(b)."

4110.3: "The authorized officer shall periodically review the grazing preference specified in a grazing permit or grazing lease and may make changes in the grazing preference status. These changes shall be supported by monitoring, as evidenced by rangeland studies conducted over time, unless the change is either specified in an applicable land use plan or necessary to manage, maintain or improve rangeland productivity."

4110.3-2(b): "When monitoring shows active use is causing an unacceptable level or pattern of utilization or exceeds the livestock carrying capacity as determined through monitoring, the authorized officer shall reduce active use if necessary to maintain or improve rangeland productivity..."

4110.3-2(c): "Where active use is reduced it shall be held in suspension..."

4120.3-1(c): "The authorized officer may require a permittee or lessee to maintain and/or modify range improvements on the public lands under 4130.6-2 of this title."

4130.6: "Livestock grazing permits and leases shall contain terms and conditions necessary to achieve the management objectives for the public lands and other lands under Bureau of Land Management administration."

4130.6-1(a): "The authorized officer shall specify the kind and number of livestock, the period(s) of use, the allotment(s) to be used, and the amount of use, in animal unit months, for every grazing permit or lease. The authorized livestock grazing use shall not exceed the livestock carrying capacity as determined through monitoring and adjusted as necessary under 4110.3, 4110.3-1 and 4110.3-2."

4130.6-2: "The authorized officer may specify in grazing permits or leases other terms and conditions which will assist in achieving management objectives, provide for proper range management or assist in the orderly administration of the public rangelands..."

PROTEST:

If you wish to protest this decision, in whole or in part, you are allowed fifteen (15) days from receipt of this notice within which to file a protest with the Egan Area Manager, HC 33 Box 33500, Ely, Nevada 89301-9408. Subsequent to the protest period, a final decision will be issued, regardless of whether or not any

protests were received. The final decision may be modified in light of pertinent information brought forth during the protest period.

WILD HORSE AND BURRO MANAGEMENT DECISION

It has been determined through monitoring that a thriving natural ecological balance will be obtained by maintaining wild horse use at the following levels:

<u>Use Area</u>	<u>Herd Mgt Area</u>	<u>AUMs</u>
Buck & Bald	Buck & Bald	883
Newark Valley	Buck & Bald	317
Long Valley	Buck & Bald	382
Long Valley Wash	Buck & Bald	<u>150</u>
		1732

Wild horse AMLs for the Warm Springs Allotment by use area are summarized as follows:

<u>Wild Horse Use Area*</u>	<u># Animals</u>
Newark/W. Buck	35
E. Buck/Long Valley	76
Long Valley Wash	30
Bald Mountain	<u>29</u>
Total	170**

* Refer to Map 5 (Wild Horse Use Areas) in the Warm Springs allotment evaluation.

** The 1732 AUMs identified for horses is less than 170 animals for 12 months, because a portion of these animals spend some time outside the allotment boundary.

The setting of wild horse numbers by allotment will eventually provide for an overall Herd Management Area (HMA) wild horse AML. Removals will occur on an HMA basis and numbers will be maintained at or near the total AML. Numbers within use areas and/or allotments may be higher or lower than the numbers identified above because of seasonal movements but the total AML for the HMA will be maintained.

In accordance with 43 CFR 4700.0-6(a), wild horse use on the Warm Springs Allotment shall be managed at 1732 AUMs.

In accordance with 43 CFR 4720.1, in the future, all wild horses in excess of the appropriate management level of 170 animals will be removed.

In accordance with 43 CFR 4710.4, all wild horses will be removed from the Diamond Mountains horse-free area.

Adjustments in wild horse numbers will be made by future Buck and Bald HMA gathers based on continued monitoring, in order to achieve and maintain the established AML.

RATIONALE: The analysis and evaluation of available monitoring data indicates that reduction in wild horse numbers in the Buck and Bald HMA, and the removal of wild horses from the Diamond horse-free area is necessary to establish and maintain a thriving natural ecological balance and to limit the animals' distribution to existing herd areas. These actions are required to prevent further deterioration of the rangeland and to avoid further irreparable damage to the natural ecological balance of the area's vegetative resource.

AUTHORITY: The authority for this decision is contained in Sec.3(a) and (b) of the Wild Free-Roaming Horse and Burro Act (P.L. 92-195) as amended and in Title 43 of the Code of Federal Regulations, which states in pertinent parts:

4700.0-6(a): "Wild horses and burros shall be managed as self-sustaining populations of healthy animals in balance with other uses and the productive capacity of their habitat."

4710.4: "Management of wild horses and burros shall be undertaken with the objective of limiting the animals' distribution to herd areas. Management shall be at the minimum level necessary to attain the objectives identified in approved land use plans and herd management area plans."

4720.1: "Upon examination of current information and a determination by the authorized officer that an excess of wild horses or burros exists, the authorized officer shall remove the excess animals immediately..."

PROTEST: Although the 4700 regulations allow for an appeal with no mention of a protest, for the purpose of consistency with the livestock management portion of this decision, the entire multiple use decision is initially being sent as a "Proposed" decision. If you wish to protest this decision, in whole or in part, you are allowed fifteen (15) days from receipt of this notice within which to file a protest with the Egan Resource Area Manager, HC 33 Box 33500, Ely, Nevada 89301-9408. Subsequent to

the protest period, a final decision will be issued, regardless of whether or not any protests were received. The final decision may be modified in light of pertinent information brought forth during the protest period.

A handwritten signature in cursive script that reads "Gene L. Drais". The signature is written in dark ink and is positioned above a horizontal line.

Gene L. Drais, Manager
Egan Resource Area

	<u>CERTIFIED MAIL #</u>
cc: Nevada Division of Wildlife, Reg. II	(P 313 269 881)
Nevada Division of Wildlife, Ely Office	(P 313 269 882)
U.S. Fish and Wildlife Service (Ruby Marshes)	(P 313 269 883)
U.S. Fish and Wildlife Service (Reno)	(P 313 269 884)
N-4 Grazing Board	(P 313 269 885)
Resource Concepts Inc.	(P 313 269 886)
International Society for the Protection of Wild Horses and Burros	(P 313 269 887)
Commission for the Preservation of Wild Horses and Burros	(P 313 269 888)
Animal Protection Institute of America	(P 313 269 889)
Sierra Club	(P 313 269 890)
Natural Resources Defense Council	(P 313 269 891)
Wilderness Society	(P 313 269 892)
Farm Bureau	(P 313 269 893)
Metropolitan Life	(P 313 269 894)
Nye County	(P 313 269 895)
Wild Horse Organized Assistance	(P 313 269 896)

APPENDIX 1: Land Use Plan/Rangeland Program Summary Objectives

B. Allotment Specific Objectives

1. Land Use Plan (RMP) Objectives

- (a) Rangeland Management - "All vegetation will be managed for those successional stages which would best meet the objective of this proposed plan." (Egan Resource Area Record of Decision, p. 3)
- (b) Wild Horses - Wild horses will be managed at a total of 700 animals within the Buck and Bald HMA (Egan ROD, p. 6)*
 - "Future adjustments in wild horse numbers will be based on data provided through the rangeland monitoring program." (Egan ROD, p. 8)

* - The 700 horses yearlong identified in the ROD is no longer a valid AML. The Interior Board of Land Appeals June 7, 1989 decision (IBLA 88-591, 88-638, 88-648, 88-679) ruled in part: "an AML established purely for administrative reasons because it was the level of wild horse use at a particular point in time cannot be justified under the statute." The IBLA further ruled that AML must be established through monitoring "in terms of the optimum number which results in a thriving natural ecological balance and avoids deterioration of the range."

- (c) Wildlife - "Habitat will be managed for "reasonable numbers" of wildlife species as determined by Nevada Department of Wildlife." (Egan ROD, p. 6)
 - "Forage will be provided for "reasonable numbers" of big game as determined by Nevada Department of Wildlife" (Egan ROD, p. 8)
- (d) Watershed - "Establish utilization limits to maintain watershed cover, plant vigor and soil fertility in consideration of plant phenology, physiology, terrain, water availability, wildlife needs, grazing system and aesthetic values." (Egan ROD, p. 44)

2. Rangeland Program Summary Objectives

- (a) "Provide forage for up to 10,261 AUMs of livestock use."
- (b) "Maintain Julian and Bald Mtn. Seedings in good or better condition."
- (c) "Improve the condition of the winterfat/nuttal saltbush dominated vegetation types on the Long Valley winter range."
- (d) Maintain or improve ecological condition of native range with utilization levels not to exceed Nevada Rangeland Monitoring Handbook (NRMH) recommended allowable use levels. Allowable use levels for winterfat and perennial grass species is 50%.
- (e) Improve mule deer yearlong habitat to good or better condition by not exceeding utilization levels on native species as recommended in the NRMH. Manage rangeland habitat and forage condition to support 10159 AUMs for mule deer.
- (f) Manage rangeland habitat and forage condition to support 125 AUMs for pronghorn antelope with potential augmentation/reintroduction.
- (g) Improve and maintain habitat condition of meadows and riparian areas from poor to good or better condition for mule deer and upland game. Utilization levels will not exceed 55% on perennial grasses and 45% on shrubs along stream riparian areas and mesic meadows.
- (h) Limit utilization of browse species in crucial deer winter range to a maximum of 45% of current annual growth.
- (i) Protect sage grouse breeding complexes by maintaining the big sagebrush sites within 2 miles of active strutting grounds for mid to late seral stage with a minimum of 30% shrub composition by weight.
- (j) Protect ferruginous hawk nest sites by limiting utilization to 50% on winterfat flats within 2 miles of nest sites.
- (k) "Improve 3.0 miles of stream riparian habitat condition from poor/fair to good or better." (Deadman and Old Deadman creeks)
- (l) Manage rangeland habitat to support wild horses as part of the Buck and Bald HMA by not exceeding allowable use levels on native species as recommended in the NRMH. Initially, provide for 280 horses in the Buck and Bald HMA (3359 AUMs).*

* - The 280 horses yearlong identified in the RPS is no longer a valid AML. The Interior Board of Land Appeals June 7, 1989 decision (IBLA 88-591, 88-638, 88-648, 88-679) ruled in part: "an AML established purely for administrative reasons because it was the level of wild horse use at a particular point in time cannot be justified under the statute." The IBLA further ruled that AML must be established through monitoring "in terms of the optimum number which results in a thriving natural ecological balance and avoids deterioration of the range."

3. Buck, Bald, Maverick, and Diamond Mountains Habitat Management Plan (HMP) - specific objectives which apply to Warm Springs, paraphrased from the HMP.

- (a) Limit utilization of bitterbrush and other browse species to 25% of current year's growth by September 30, to ensure adequate forage availability for wintering mule deer, at the following key locations:

Overland Pass	T 25 N, R 57 E
Big Bald Mtn West	T 24 N, R 57 E
Water Canyon/Bald Mtn.	T 24 N, R 57 E
Mahoney Canyon	T 24 N, R 58 E
Cherry Springs	T 24 N, R 58 E
Mooney Basin	T 23 N, R 58 E
Buck Pass	T 22 N, R 57 E
Orchard Canyon	T 22 N, R 56 E
Little Willow Springs	T 21 N, R 57 E
Willow Springs	T 21 N, R 57 E

- (b) Limit utilization levels to 55% of current annual growth on perennial grasses and grasslike species along stream riparian areas and mesic meadows by November 1 at the following key locations:

Cottonwood Cyn/Buck Mtn.	T 22 N, R 57 E, sec.30
Handy Spring	T 22 N, R 55 E, sec. 9
Water Canyon/Bald Mtn.	T 24 N, R 57 E, sec.20
Mud Spring	T 22 N, R 57 E, sec.32
Orchard Canyon	T 22 N, R 56 E, sec.36
Little Willow Spring	T 21 N, R 56 E, sec. 6
Old Deadman Creek	T 21 N, R 56 E, sec. 9
Deadman Creek	T 21 N, R 56 E, sec.16

- (c) Limit utilization to 45% of current year's growth on riparian shrub species, and 25% on riparian tree species by November 1 at the following locations:

Cottonwood Cyn/Buck Mtn.	T 22 N, R 57 E, sec.30
Orchard Canyon	T 22 N, R 56 E, sec.36
West Buck Mtn.	T 21 N, R 56 E, sec.27

(d) On Deadman Creek, (rated poor in 1989) limit utilization on streamside vegetation to 0-20%.

(e) Limit utilization of winterfat to 55% at the following locations, to protect ferruginous hawk prey-base habitat:

McBride's Sheep Well
Shallow Well

T 21 N, R 58 E, sec.25
T 21 N, R 57 E, sec. 8

(f) Manage the following key sage grouse areas for late mid seral stages, with at least 25% sagebrush cover.

Mouth of Bourne Canyon
Long Valley Slough

T 23 N, R 56 E, sec.10
T 23 N, R 58 E, sec.26

2/22/94

WHO A

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



... a note from

Dawn Y. Lappin

February 22, 1994

Gene D. Drais, Manager
Range Resource Area
BLM-Ely District Office
HC33 Box 33500
Ely, Nevada 89301-9408

SUBJECT: Protest of the Proposed Full Force and Effect Multiple Use Decision for the Warm Springs Allotment

Dear Mr. Drais,

Thank you for the opportunity to review and comment on the proposed decision for the Warm Springs Allotment.

Although we are in full agreement with your decision to reduce the amount of grazing animals using the allotment we must protest your calculations that set the AUM's for wild horses at 1,732. We have calculated, using your own data, that with the overall AUM's being used that wild horses caused 31% of the damage and livestock caused 69%. Therefore, it only stands to reason that when reductions are taken that since wild horses caused 31% of the damage, they should take 31% of the reduction. This is supported by the 1989 IBLA decision stating that the offending animals need to be reduced...31% of the reduction. Our calculations using your data state that there should be 2,558 AUM's allocated for wild horse use, or 213 animals.

In addition, on page 6 **, you state that the AUM's calculated for this allotment is less "because a portion of the animals spend some time outside the allotment boundary." When you calculated that wild horses were using 5,502 AUM's, we haven't been able to determine where in these documents you have taken into consideration "a portion of these animals spending some time outside the allotment boundary." We must also protest on this point.

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

Sincerely,
Dawn Y. Lappin

DAWN Y. LAPPIN
Director



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Ely District Office
HC 33 Box 33500
Ely, Nevada 89301-9408

3/18/94
Back + Bald HMA
TAKE PRIDE IN AMERICA

IN REPLY REFER TO:

4700 (NV-047)

MAR 18 1994

Wild Horse Organized Assistance
c/o Mrs. Dawn Lappin
P. O. Box 555
Reno, Nevada 89504

Dear Ms. Lappin:

This letter is to again respond to some of your concerns that are repeated in your recent comment letters on the allotment evaluations and decisions. Your hectic schedules and that of my staff have not allowed contact by phone.

A repeated concern in your letters on Moorman Ranch Evaluation, Railroad Pass Evaluation, and the Warm Springs Proposed Decision is the reduction from preference for livestock and most recent census for wild horses. Your main concern is with the reduction from preference and not from actual use. This reduction from preference is not an option I have to change. Under 43 CFR 4110.3-2(c), "Where active use is reduced it shall be held in suspension or in nonuse for conservation/protection purposes, until the authorized officer determines that active use may resume." It is the Bureau's interpretation from the Washington and State Office level that "active use" specified in the CFR refers to active preference. Therefore, I have no option but to reduce from active preference.

In addition, the following are responses to individual allotment concerns.

Medicine Butte

Your concerns over the domestic horse permit within this allotment were taken into consideration when we prepared the Final Decision to allow this use to continue. The domestic horses will now only be allowed to graze within fenced seedings. The seedings are on the edge of the HMA and wild horses do not make use around the seedings, although they lie within the HMA boundary. The seedings were fenced prior to 1971 to preclude use by wild horses and were meant to be grazed only by livestock. In fact, wild horses have never grazed the seedings and allowing domestic horse use there will not create a conflict with wild horses.

Railroad Pass

Page 1, Wild Horse Use

We do use all available sightings, on the ground counts, and annual census to do the best we can at identifying the wild horses that use an allotment. Population modeling would not lend itself to this because modeling is only intended to track population growth and age structure. This type of data would not show movement and actual use information.

Page 3, Allotment Specific Objectives

The numbers established in the Record of Decision for livestock and wild horses were management levels that would meet management objectives. It has been the Bureau's intention, from that point on, to make any changes in stocking rates based on monitoring. This is what we are attempting to do.

Page 7, Carrying Capacity Computations

1) We have noted your concerns, along with other interests, that sheep use has not been included in the stocking rate calculations. Changes will be made to include them in the Management Action Selection Report and Final Decision.

2) The Bureau is required to take into account environmental factors in making grazing adjustments. The Ely District has adopted the Sneva Index as a valid tool to adjust for changes in moisture.

3) As discussed before, we are required to reduce from preference. We attempted to attribute the use to the offending animal based on 77% actual use by wild horses and 23% actual use by cattle. This would have resulted in reducing the wild horse population below 0 which was not an option.

We then attempted the reduction based on a needed 58% reduction overall. This resulted in the livestock operators being reduced 58%, while only making 23% of the actual use, and wild horses being reduced 42%, while making 77% of the actual use. We did not feel this was fair.

We then used our existing Land Use Plan proportion for AUMs of 84% for livestock and 16% for wild horses. This results in livestock receiving 84% of available AUMs and wild horses receive 16% of available AUMs. We felt this was the most fair method to both users.

Warm Springs

You mentioned that you could not determine how seasonal use by wild horses was figured into the calculations. I would direct you to page 17 of the allotment evaluation. This information was not included in the proposed decision because of the lengthy discussion needed.

We are sorry we have not been able to contact you by telephone to this point. Please feel free to call Joe Stratton Egan Resource Area Wild Horse Specialist, at 702-289-4865 if you have further questions or if you would like to set up a conference call to discuss your concerns in greater detail. We welcome your cooperation and input to our process.

Sincerely,



Gene L. Drais, Manager
Egan Resource Area