

Your introduction shows a recommendation of 450-500 wild horses and burros, yet the proposal would require the removal of a significantly higher percentage for the expediency of management.

We assume there must have been some data or biological base from which the "recommended" 450-500 animals was developed. Quite naturally then we would inquire why the animals could not be reduced to the 450-500 level, using scientific data to manipulate age and/or sex ratio to a predetermined level, then gradually building up and reducing. The only plausible explanation to not considering would be the meager sums that would be utilized during that build up would not be available to commercial use. Granted the expenditure in manipulation would be greater initially, but in the long term these would be replaced in lieu of continued capture. Once the population ratios were manipulated the simple removal of specific age and sex class in culls would achieve the stabilization needed.

Specific trends were not determined by allotment FES 1979, 2-23, due to insufficient data, therefore we query what base was utilized to determine either population levels (340-390; 450-500) and the impact by species on the resource. The tables shows little competition by wild horses with other user groups and with a proposed reduction to 450-500 this would even be less. The wild horse & burro use is 39% of the Caliente Planning Unit, and given this proposal - even smaller (1,396,000 acres) (According to Nevada Statistics - 1976 (last year with livestock acreage grazed) shows Sec. 3, Caliente to

have 5,864,277 acres devoted to livestock grazing. With annual unit months proposed at 87,764 for livestock and 4200 for wild horses and burros, the percentage of use then becomes .048% from wild horses. (FFS 1979 est. a 6% livestock reduction). Unmistakenly it is not multiple use by any stretch of the imagination.

Probably more disconcerting element of the proposal is to remove horses and burros from existing ranges. Reuber Law PL 92-195, 92nd Congress, S. 1116 on December 15, 1971 stated "... and to accomplish this they are to be considered in the area where presently found, as an integral part of the natural system of the public lands." Sec 2(c)

'range' means the amount of land necessary to sustain an existing herd or herds of wild free-roaming horses and burros which does not exceed their known territorial limits... Policy 4700.0-6(c) states "... where found on public lands shall be considered comparably with other resource values..." 4730.1(a) states "inventory... shall be maintained... where a herd exists for the purposes of evaluating population dynamics including whether and where excess animals exist as a basis for making management decisions." No where in the Act, its amendments or policies does it state that feasibility of management is the basis for removal of entire herd or herds of horses.

We appreciate the efforts of the local horse organization in the acquisition of sums for wild horses however, that in no way should alter their management in other areas where presently found.

Plan does not identify any positive benefits to the horses, does not imply that as range impasse + cattle are increased that w/h will also benefit. Although the FES 1979 states that waters are not adequate for optimum distribution of livestock, wild life, w/h + B. due to the fact that troughs are turned off when livestock is not present, the EA does not propose an alternative such as water development.

# Southern portion of dry lake valley, proposed horse removal, is not identified in the FES 1979 as a grazing allotment. If no livestock are present, why removal of horses.

In the HMA either mechanical, turning or chemical vegetation map manipulation is proposed

8-16" inches precipitation

Shallow cover - deep cover - tertiary volcanic rocks

Soils - semi arid terraces + fans igneous rocks

Soils on mtns + fans sedimentary rocks.

erosion condition + trend studies in order to be accurate would have to reflect the allotment trends.

What effect would removal have on lands within the meqstony unit

Sagebrush, desert shrubs, Joshua tree,  
penion-juniper

FES 1979 Bem cannot assure yearlong  
W/N + B use from privately owned  
water (Lalleshake, Oak Springs)

Get you propose to remove  
houses from other areas, design  
HMS areas where water is  
questionable.

Oak Springs vL 5 pasture

As per request, we are documenting our concerns to the Caliente proposal for wild horses and burros.

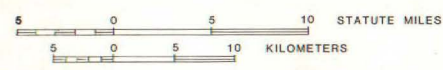
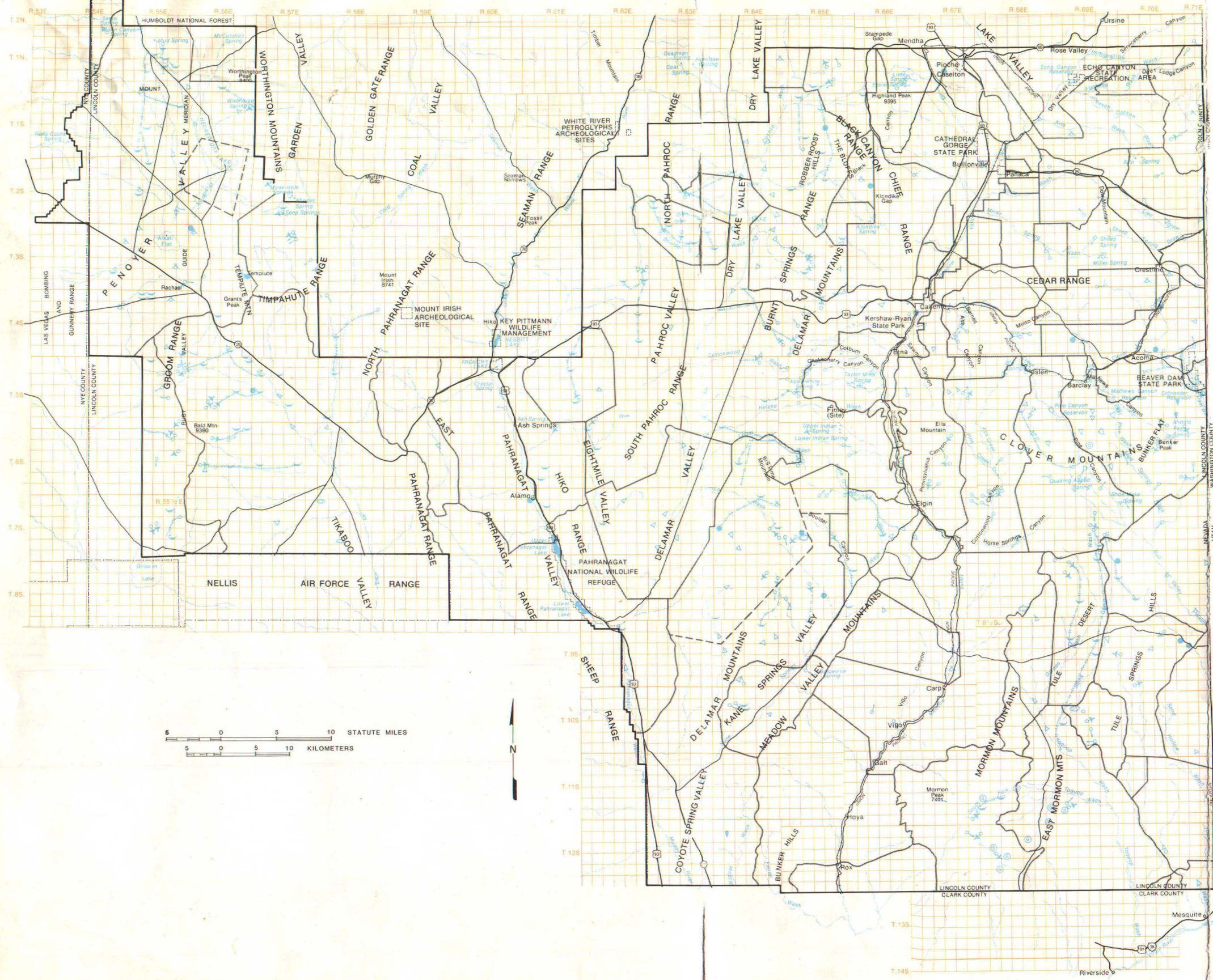
Your introduction shows a recommendation of 450-500 animals in the Caliente - Virgin Valley resource area, yet the proposal requires the removal of a substantial number in addition to the excess in favor of feasibility. Specific trends were not determined by allotment in the ES area, due to insufficient data; (2.23) therefore we see no basis in believing that a downward trend will prevail after wild horses, burros and cattle are reduced.

Little Mtn. year long grazing

Vegetation

Range improvements  
vegetation manipulation  
do little to benefit wild horses & B

6% red. c- 1980 (<sup>FES</sup> 62)



SECTIONALIZED TOWNSHIP

6	5	4	3	2	1
7	8	9	10	11	12
13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30
31	32	33	34	35	36

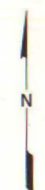
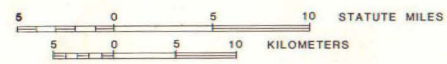
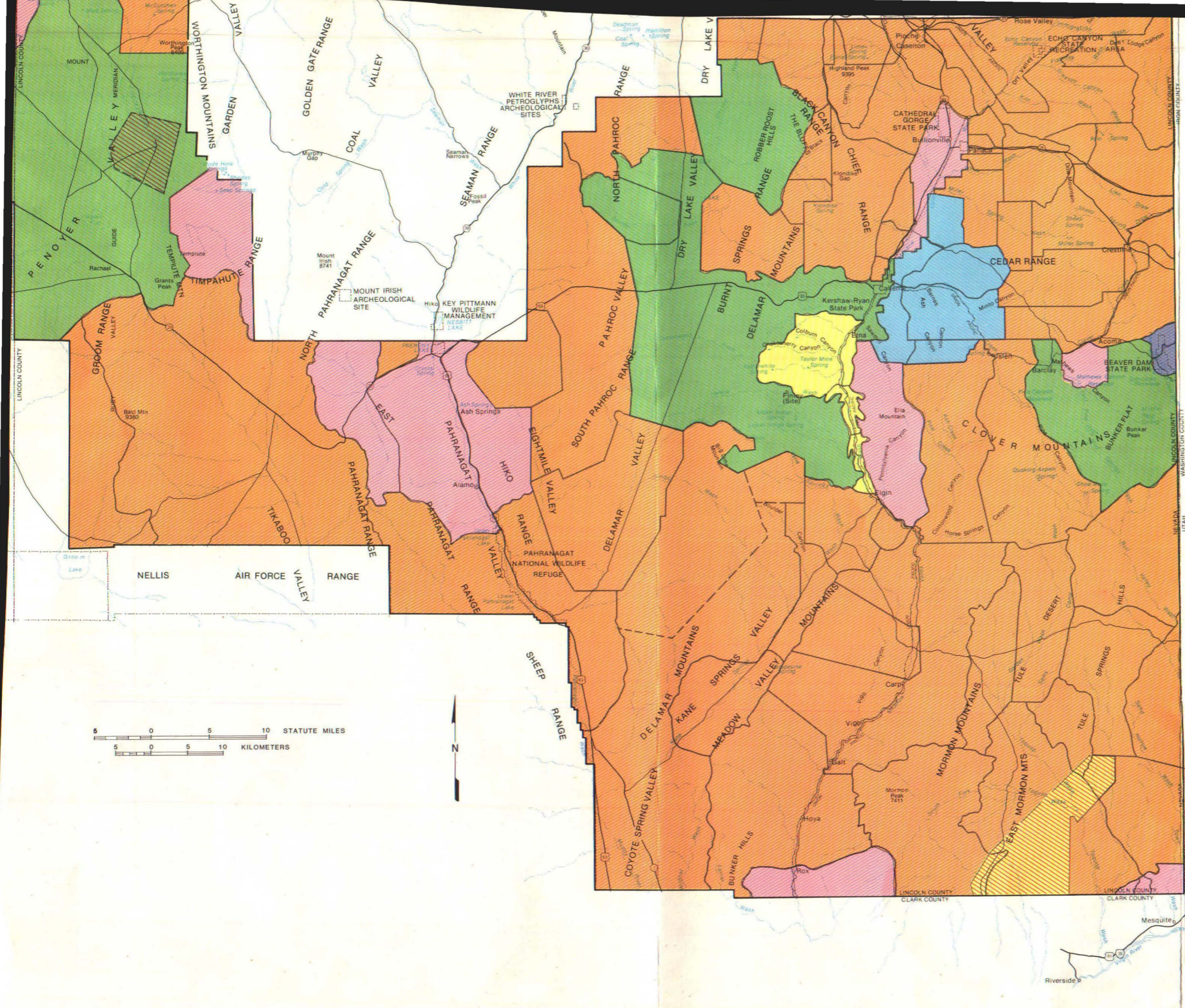


- PIPELINE
- WELL
- WINDMILL
- SPRING
- IMPROVED SPRING
- WATER TROUGH
- WATER STORAGE
- BLM GUZZLER
- OTHER GUZZLER
- EARTH TANK OR CHARCO RESERVOIR
- SOIL CONSERVATION SERVICE SNOW SURVEY COURSES

UNITED STATES  
DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT

CALIENTE ENVIRONMENTAL STATEMENT

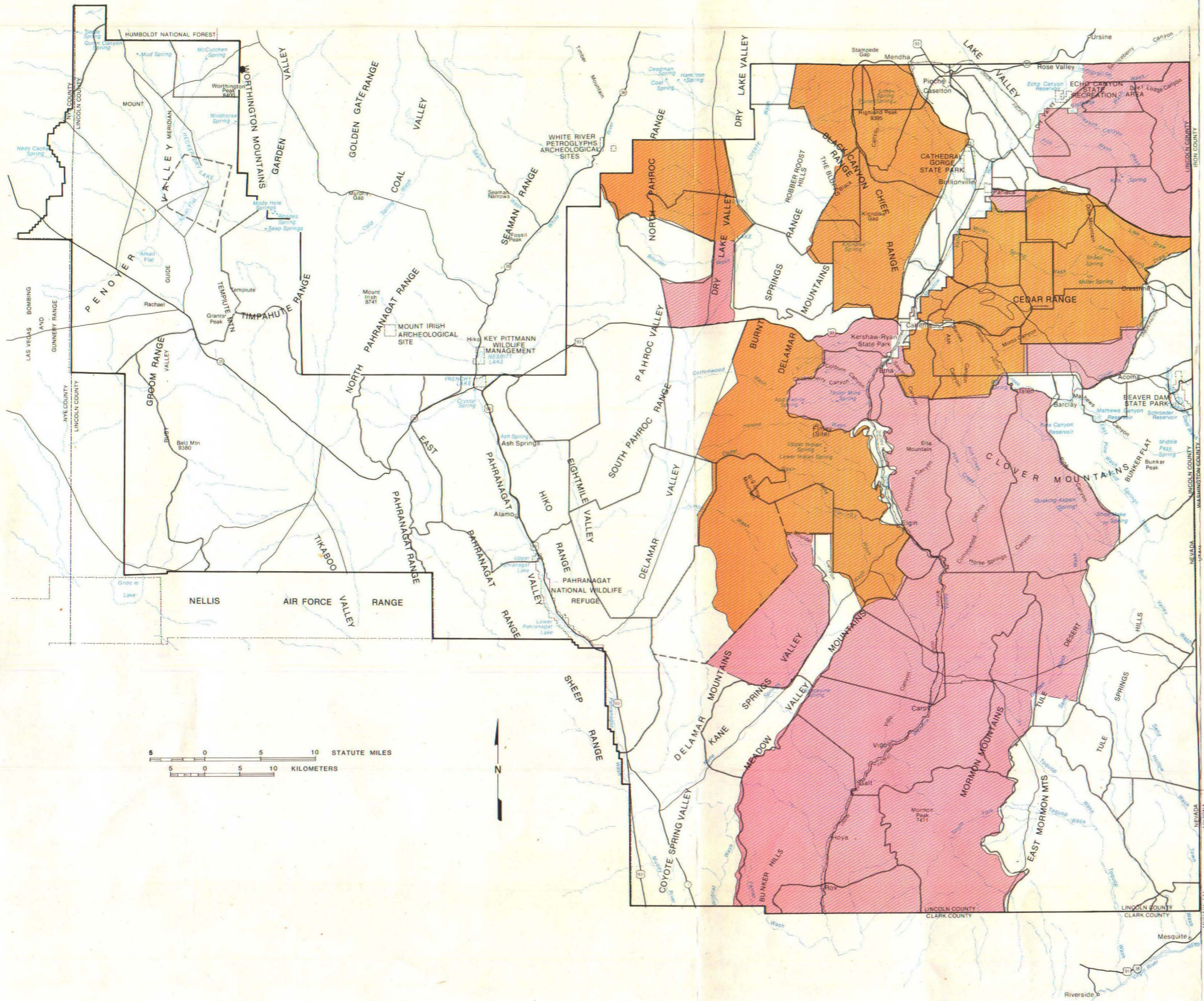
# WATERS



UNITED STATES  
DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT

CALIENTE ENVIRONMENTAL STATEMENT

RANGE MANAGEMENT INTENSITY



WILD HORSE AND BURRO REMOVAL AREA  
 HERD MANAGEMENT AREA

UNITED STATES  
 DEPARTMENT OF THE INTERIOR  
 BUREAU OF LAND MANAGEMENT

CALIENTE ENVIRONMENTAL STATEMENT

## WILD HORSE MANAGEMENT AREAS



## SECTIONALIZED TOWNSHIP

6	5	4	3	2	1
7	8	9	10	11	12
18	17	16	15	14	13
19	20	21	22	23	24
30	29	28	27	26	25
31	32	33	34	35	36



## ALLOTMENTS

- |                           |                           |
|---------------------------|---------------------------|
| 1. Red Bluff              | 44. Ely Spring AMP        |
| 2. Sand Springs AMP       | 45. Simpson               |
| 3. McCutcheon Spring      | 46. Ely Spring Sheep      |
| 4. Shadow Well            | 47. Pioche                |
| 5. Crescent               | 48. <b>Highland Peak</b>  |
| 6. <b>Naquinta Spring</b> | 49. Comet                 |
| 7. Bald Mountain          | 50. Rocky Hill            |
| 8. Pine Cone              | 51. Peck                  |
| 9. Crystal Springs        | 52. Panaca Cattle         |
| 10. Pahrnagat West        | 53. White Hills           |
| 11. Pahrnagat East        | 54. Roadside              |
| 12. Six Mile              | 55. Warm Spring           |
| 13. Lower Lake            | 56. Black Hills           |
| 14. Buckhorn              | 57. Condor Canyon         |
| 15. Pahroc                | 58. N-4                   |
| 16. Rattlesnake           | 59. Deer Lodge            |
| 17. Mustang AMP           | 60. <b>Mahogany Peak</b>  |
| 18. Oak Springs AMP       | 61. McGuffy Spring        |
| 19. Delamar               | 62. Panaca SCS            |
| 20. Grapevine             | 63. Rabbit Spring         |
| 21. Breedlove             | 64. Buckboard Spring      |
| 22. Rox                   | 65. Sheep Spring          |
| 23. Mormon Peak           | 66. Uvada                 |
| 24. Henrie                | 67. Crestline             |
| 25. Morrison - Wengert    | 68. Oak Wells             |
| 26. Boulder Spring        | 69. Crossroads            |
| 27. Elgin                 | 70. Enterprise G.S.       |
| 28. Schlarman             | 71. Haypress              |
| 29. Ash Flat              | 72. Barclay AMP           |
| 30. Meadow Valley         | 73. Sheep Flat            |
| 31. Pennsylvania          | 74. Cottonwood            |
| 32. Applewhite            | 75. Garden Springs        |
| 33. Sawmill               | 76. White Rock            |
| 34. Mustang Flat          | 77. <b>Gourd Spring</b>   |
| 35. Clover Creek          | 78. Beacon                |
| 36. Little Mtn            | 79. Flat Top Mesa         |
| 37. Cove                  | 80. <b>Pulsipher Wash</b> |
| 38. Caliente              | 81. Jackrabbit            |
| 39. Highway               | 82. Sand Hollow           |
| 40. Bennett Spring        | 83. Summit Spring         |
| 41. Cliff Spring          | 84. <b>Snow Springs</b>   |
| 42. Klondike              | 85. Terry                 |
| 43. Black Canyon          | 86. Lime Mountain         |

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CALIENTE ENVIRONMENTAL STATEMENT

## GRAZING ALLOTMENTS

IRON COUNTY  
WASHINGTON COUNTY  
UTAH  
ARIZONA  
MOHAVE CO.

~~ORIGIN - NAME~~

First of all a 53% reduction in wild horse use while proposing nearly a 100% increase in livestock use. The proportionate increase in wild allocations fall short of comparable to other resource values.  
NEPA & CEG guidelines etc

6% Livestock  
53% WH

4730 - comparable

strict interpretation

Judge Richey Minimal Feasible Letters  
C pg 1-5

What contingency plans have been developed.

C pg 1-5

What will happen if funds are not forthcoming to implement studies on actual use, condition, trend & utilization

d pg 1-5

What about improving relationships with other concerned interests;

within 10 years propose to increase livestock 20% above the 1977 permitted use.

(I) pg 1-13 who would review the EA on range improvement projects

(II) pg 1-15 who would guarantee these gates would be open.  
over

check  
I.C.  
supra  
infra

Table 1-9 pg 1-20

492 miles of fencing

74,293 L

~~5,956 WL~~

5,956 H

4,312 WL

Table 1-10 pg 1-21

9,614, 317

Table 1-4

Demonstrate the unresolved conflicts

One reason for elimination for WH in Moerman Mtns was high; but the quality recreational values are in fact as serious impact to BH as allegedly the horses were.

Show the area of conflict with Big Horn, Garage, Space, water, cover?

Will cattle be removed from BH Range since diet is similar. There are special limitations

(BH (1977 est. - 763)

2-37 desert tortoise (2-39)

impacts of grazing by any large mammal - be it cattle, horses, wildlife etc can & do occur, however the largest impact is still loss of habitat due to human encroachment and recreational use in critical areas.

2-44 "Some WH movement may occur; WH movement "probably" occurs. Higher elevations "most likely" receive.

2-50

What assurance do we have that proposed AMPs will be any more successful than previous AMPs. ~~What~~ What if funds for studies, monitoring, man power are not forthcoming?

17,466  
10,976  

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28,442

2.63 though Bem # recognizes the illegality of recog. capitalized value for grazing preclude it never the less quantitates the wealth derived from same.

pg 3-1

~~Will the horse elimination & reduction await~~ Why will it take 10 years to manage livestock & only 3 years to manage horses.

~~Table 3-4~~

pg 3-15

You propose to eliminate WH from critical areas, yet continue to impact the BH with cattle!

1980  
Cattle 5606  
2015  
11,860  
Sheep 2,928  
8,048  
WH 497  
754

3-17 Reduction of any BH pop. is unacceptable.

3-18 have no problem with substantiated conflict with tortoise

pg 3-22 Reduction in habitat & still the dominant use is livestock;

pg 3-24 impacts on grazing  
increases!

pg 3-33 by 1983 county revenues from  
taxes on L would be eliminated.