

1-13-91

W H O A

WILD HORSE ORGANIZED ASSISTANCE

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BOARD OF TRUSTEES

DAVID R. BELDING
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In Memoriam

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

January 13, 1991

Rene P. Demeule, District Ranger
Humbolt National Forest
Ely Ranger District
P.O. Box 539
Ely, Nevada 89301

Dear Ms. Demeule,

Thank you for the opportunity to comment on the preparation of an EA to analyze a proposal, to prepare an Allotment Management Plan for the Tom Plain, Ellison Basin and Blackrock Battle and Horse Allotments (3 scoping documents). Allotment Evaluation Process.

We wish to be considered an interested and affected party as our concern by law is for the protection of wild horses and their habitat in Nevada.

We wish to be included in the evaluation process for any of the allotments listed that contain wild horses and/or their habitat.

Our main concern for the wild horses during the allotment evaluation process is who ate what....when and where.

Some of the information we would need to evaluate the allotment in question would be:

- 1) Actual Livestock Use
 - (a) Actual Use Reports
- 2) Season of Use by Wild Horses
- 3) Season of Use by Livestock
- 4) Seasonal Census...showing where the majority of wild horses graze during seasonal yearly movements.
- 5) Use Pattern Mapping
- 6) Location of water used by livestock and wild horses.
- 7) Map of the Territory in relationship to the allotment that shows distribution of horses, cows, and water.

In the issues and concerns you stated that wild horses are increasing and spreading and entering the allotment from Monte Cristo and Jakes Valley herds.

- 1) Do you have monitoring data that substantiates that wild horses are causing vegetation/soil damage?
- 2) How do you know whether or not the movement is not the result from the drought?
- 3) Do you know whether or not this is "historical migration" in times of severe climatic influences?
- 4) Are practices within herd territory affecting their seasonal use?
- 5) Are the issues related solely to increasing numbers?

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Before we could make a recommendation on grazing alternatives, we would have to know what area horses are using cccc what are their critical use areas; and what affect would change in livestock make on wild horses in their territory.

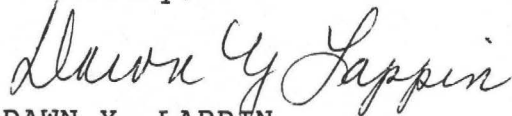
We would also need to know numbers of wild horses, and the forage capacity for their herd area.

Any specific conclusions or technical recommendations you present in any of the allotments in question should be thoroughly defined, well documented statements that support your decisions to maintain the public lands in a thriving natural ecological balance and prevent a deterioration of the range.

Again, thank you for the opportunity to participate in the evaluation process. Please keep us informed.

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

Sincerely,



DAWN Y. LAPPIN
Director