



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

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

In Reply Refer To:
4130 (NV-046)

APR 5 1996

Mr. John Gurley
1400 Colorado Street #C
Boulder City, NV 89005

CERTIFIED MAIL NO. Z 425 081 622
Return Receipt Requested

**NOTICE OF FINAL MULTIPLE USE DECISION
FOR THE FOREST MOON ALLOTMENT**

BACKGROUND INFORMATION:

The Management Framework Plan and the Record of Decision for the Schell Grazing Environmental Impact Statement were issued in June and July of 1983, respectively. These documents guide the management of public lands within the Forest Moon Allotment. The Schell Resource Area Record of Decision dated July 1983 states in pertinent part:

"When adequate monitoring data becomes available adjustments to the grazing capacity will be made that are compatible with the multiple use objectives...

Implementation of the range management program will take place through monitoring and consultation and coordination with all interests concerned with the management of resources in a given local area; landowners, land management agencies, wildlife groups, wild horse groups, conservation organizations, etc. Grazing adjustments, if required, will be based upon reliable vegetation monitoring studies, consultation and coordination, baseline inventory, or a combination of these...

Prior to initiating grazing adjustments, the Bureau, within the guidance of the Management Framework Plan and consultation and coordination, will consider the specific management objectives for an allotment and other resource values (e.g., riparian habitat, water quality, wildlife, recreation, wild horses and livestock) to be evaluated in determining progress in meeting these objectives. Changes in the resource values may warrant a modification of the scheduled adjustments and thus indicate the intensity and types of monitoring that will be required in each allotment..."

Monitoring studies were initially established in 1987 and have been conducted 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 Forest Moon Allotment. Input was received from the permittee, Nevada Division of Wildlife, Resource Concepts Inc., State of Nevada Commission for the Preservation of Wild Horses, and International Society for the Protection of Mustangs & Burros.

Appendices I through IV show the management objectives for livestock, wild horses, and wildlife on the allotment. These objectives are in conformance with and formulated to accomplish the Schell Land Use Plan multiple use objectives as they relate to all grazing use on the Forest Moon Allotment. The permitted use specified in this decision will continue to be monitored to measure achievement of management and resource objectives for the public lands in this allotment.

I have reconsidered the proposed multiple use decision in response to the protest received and base upon this review and a meeting to discuss the reasons for protest no modifications were made to the proposed decision.

A legal description was added for clarification of the rangeline boundary between Forest Moon and Hardy Springs Allotment. Some text changes were made for clarification.

THEREFORE, BASED UPON THE EVALUATION OF MONITORING DATA FOR THE FOREST MOON ALLOTMENT, RECOMMENDATIONS FROM DISTRICT STAFF, INPUT RECEIVED THROUGH CONSULTATION, COOPERATION, AND COORDINATION WITH THE PERMITTEE, AND PUBLIC INTEREST GROUPS, THE FINAL DECISION IS AS FOLLOWS:

The analysis of monitoring data has revealed that two of the seven multiple use objectives for the Forest Moon Allotment are not being met under the existing management practices; therefore, implementation of management actions and adjustments to livestock and wild horses are necessary to meet these objectives. Allowable use levels for the key species selected for specific use areas on the allotment have been exceeded; use pattern data indicates poor distribution of livestock and wild horses. Livestock and wild horse grazing contributed to the high use levels recorded on the Forest Moon Allotment. Grazing use is adjusted to allow for short term (allowable use level) objectives and associated long term objectives to be met. These adjustments would initiate the required improvement of rangeland conditions. Wildlife use is not contributing to the non attainment of multiple use objectives.

LIVESTOCK MANAGEMENT DECISION

In accordance with 43 CFR 4110.3, 4110.3-2(b) and 4130.3-1(a) the authorized livestock permitted use shall be changed as follows:

Livestock Grazing Adjustments

Based on adjustments in season of use and reduction in livestock numbers, the following permitted use will become effective on June 1, 1996:

From:	<u>Total AUMS</u>	<u>Suspended AUMS</u>	<u>Active Preference AUMS</u>
	4,027	47	3,980
To:	<u>Permitted Use AUMS</u>	<u>Historic Suspended AUMS</u>	
	2,263	47	

Authorized livestock use, effective 06/01/96, will be as follows:

<u>Livestock No.</u>	<u>Kind</u>	<u>Period of Use</u>	<u>% PL</u>	<u>Active Use</u>
226	Cattle	06/01 to 03/31	100	2,263

In accordance with 43 CFR 4130.3-2, the following terms and conditions are hereby incorporated into the grazing permit for the Forest Moon Allotment. A new term permit will be issued once the Final Multiple Use Decision goes into effect.

1. Actual use must be submitted within 15 days after completing scheduled use.
2. Locate salt and/or mineral supplements for cattle at locations no closer than ½ mile from water sources.
3. Water control management practices will be utilized to improve livestock distribution. Appendix V shows the water control management guideline.

"RESERVED FOR WILDLIFE" ALLOTMENT

In accordance with the Final Multiple Use Decision for Hardy Springs Allotment the "Reserved for Wildlife" Allotment will be split between Forest Moon and Hardy Springs Allotments. This will prevent livestock drift between the two allotments and will prevent unauthorized use of the "Reserved for Wildlife" Allotment. The "Reserved for Wildlife" Allotment is not used by wildlife but is used by cattle from both adjacent allotments.

The Hardy Springs Final Multiple Use Decision dated March 6, 1996 set forth the following rangeline division between Forest Moon and Hardy Springs Allotments. The northern rangeline of the Forest Moon Allotment and the southern rangeline of the Hardy Springs Allotment will be described: Commencing at the ridgeline near the SW corner of the SE¼SE¼ of Section 17, T. 7 N., R. 59 E., MDPM and heading in an easterly direction approximately 14.25 miles to the fence located near the SW corner of SW¼ of Section 14, T. 17 N., R. 61 E., MDPM (See Map 1).

RATIONALE: The analysis and evaluation of available monitoring data indicates that two of the multiple use objectives for the allotment are not being met, therefore permitted use and management practices must be modified to meet the multiple use management objectives for the Forest Moon Allotment as identified in the Appendices. Since livestock are contributing to the non attainment of multiple use objectives on the allotment, livestock are being reduced. The prescribed adjustments in stocking rates, grazing practices and increased intensity of management will initiate the accomplishment of the multiple use objectives. These actions are necessary to improve the natural ecological balance of the area's vegetative resources for all users by improving plant diversity in plant communities. In addition these actions could increase desirable plant species in the area.

Grazing will be limited during the critical growing season, April and May, which is when the key forage plants are using their stored carbohydrate reserves in order to grow. This is necessary because if plants are continuously grazed heavily during this growth period, carbohydrate reserves in the roots become depleted and are not restored and plants lose their vigor.

Future monitoring data will be evaluated to determine if livestock management practices as specified in this decision for the Forest Moon Allotment are meeting or making progress towards the allotment specific objectives. A decision by the Bureau will then be made to either increase, maintain or reduce the permitted use as identified for these use areas and/or modify the terms and conditions of the grazing permits.

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

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 permitted use specified in a grazing permit or grazing lease and shall make changes in the permitted use as needed to manage, maintain or improve rangeland productivity, to assist in restoring ecosystems to properly functioning condition, to conform with land use plans or activity plans, or to comply with the provisions of subpart 4180. These changes must be supported by monitoring, field observations, ecological site inventory or other data acceptable to the authorized officer."

4110.3-2(b): "When monitoring or field observations show grazing use or patterns of use are

not consistent with the provisions of subpart 4180, or grazing use is otherwise causing an unacceptable level or pattern of utilization or, when use exceeds the livestock carrying capacity as determined through monitoring, ecological site inventory or other acceptable methods, the authorized officer shall reduce permitted grazing use or otherwise modify management practices."

4110.3-3(a): "After consultation, cooperation and coordination with the affected permittee or lessee, the State having lands or managing resources within the area, and the interested public, reductions of permitted use shall be implemented through a documented agreement or by decision of the authorized officer..."

4130.3: "Livestock grazing permits and leases shall contain terms and conditions determined by the authorized officer to be appropriate to achieve the management and resource condition objectives for the public lands and other lands administered by the Bureau of Land Management, and to ensure conformance with the provisions of subpart 4180 of this part."

4130.3-1(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 of the allotment."

4130.3-2: "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..."

APPEAL:

Any applicant, permittee, lessee or other person whose interest is adversely affected by the final livestock grazing portion of this decision may file an appeal and petition for stay of the decision pending final determination on appeal. The appeal and petition for stay must be filed in the office of the authorized officer as noted above, within 30 days following receipt of the final decision.

The appeal shall state the reasons, clearly and concisely, why the appellant thinks the final decision is in error.

Should you wish to file a motion for stay, the appellant shall show sufficient justification based on the following standards:

- (1) the relative harm to the parties if the stay is granted or denied;
- (2) the likelihood of the appellant's success on the merits;
- (3) the likelihood of immediate and irreparable harm if the stay is not granted;
- (4) whether the public interest favors granting the stay.

As noted above the petition for stay must be filed in the office of the authorized officer.

WILD HORSE AND BURRO MANAGEMENT DECISION

Manage the wild horses at the appropriate management level (AML) of 184 AUMs (15 horses yearlong) $\pm 15\%$ on the Forest Moon Allotment. This AML has been determined to be the optimum level to maintain a thriving natural ecological balance and prevent deterioration of the range in this portion of the Seaman Herd Management Area (HMA).

AML will remain at 15 horses $\pm 15\%$ unless further monitoring data indicate a change is necessary.

Setting wild horse numbers by allotment will eventually provide a total AML for the entire HMA. Removals will occur on a 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 Forest Moon Allotment shall be managed at 184 AUMs or 15 horses yearlong.

In accordance with 43 CFR 4720.1, all wild horses in excess of the appropriate management level for the total HMA will be removed.

Monitoring will continue to ensure that AML is maintaining a thriving natural ecological balance.

RATIONALE: The analysis and evaluation of available monitoring data indicate that a change in management actions for wild horses is needed to meet multiple use management objectives on the Forest Moon Allotment as identified in Appendix I. An over population of wild horses contributed to overutilization and reduction in preferred plant composition at the key areas. The data indicate there are 184 AUMs of forage available for wild horse grazing use on the Forest Moon Allotment.

AML may be modified base on future monitoring data.

If future monitoring data shows that there are additional AUMs available in the Forest Moon Allotment, wild horses will receive a proportional increase along with all other users.

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."

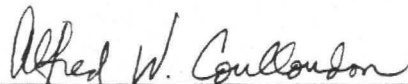
4710.4: "Management of wild horses and burros shall be undertaken with the objective of limiting the animals' distribution to herd areas. Management shall be at the minimum level necessary to attain the objectives identified in approved land use plans and herd management area plans."

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..."

APPEAL:

Within 30 days of receipt of this decision, you have the right of appeal to the Interior Board of Land Appeals, Office of Secretary, in accordance with the regulations at 43 CFR 4.4. If an appeal is taken, you must follow the procedures outlined in the enclosed Form 1842-1, Information on Taking Appeals to the Interior Board of Land Appeals. Within 30 days after you appeal, you are required to provide a Statement of Reasons to the Interior Board of Land Appeals and a copy to the Regional Solicitors Office listed in Item 3 on the form. In addition, please provide this office with a copy of your Statement of Reasons. Copies of your appeal and the Statement of Reasons must also be served upon any parties adversely affected by this decision. The appellant has the burden of showing that the decision appealed from is in error.

In addition, within 30 days of receipt of this decision, you have the right to file a petition for a stay (suspension) of the decision together with your appeal, in accordance with the regulations at 43 CFR 4.21. The petition must be served upon the parties specified above. The appellant has the burden of proof to demonstrate that a stay should be granted.



Alfred W. Coulloudon, Manager
Schell Resource Area

(Certified Mail No.)

Nevada Division of Wildlife, Region II	(Z 425 081 623)	
Nevada Division of Wildlife, Region III	(Z 425 081 624)	
Nevada Division of Wildlife, Kraig Beckstrand	(Z 425 081 625)	
Nevada Division of Wildlife, Mike Podborny	(Z 425 081 626)	
U.S. Fish and Wildlife Service	(Z 425 081 627)	
Resource Concepts, Inc.	(Z 425 081 628)	
Nevada State Grazing Board, N-4	(Z 425 081 629)	
Natural Resources Defense Council	(Z 425 081 630)	
Animal Protection Institute of America	(Z 425 081 631)	
Sierra Club, Toiyabe Chapter	(Z 425 081 632)	REFUSED 2425 081 646
Nevada Cattlemen's Association	(Z 425 081 633)	
Commission for the Preservation of Wild Horses	(Z 425 081 634)	
Nevada Farm Bureau Federation	(Z 425 081 635)	
Marvel and Hansen	(Z 425 081 636)	
Wild Horse Organized Assistance	(Z 425 081 637)	
Nevada Outdoor Recreation Association	(Z 425 081 638)	
American Wildlands	(Z 425 081 639)	
International Society for Protection Of Mustangs and Burros	(Z 425 081 640)	
Nye County Commissioners	(Z 425 081 641)	
American Horse Protection Association	(Z 425 081 642)	

cc:
Ely Ranger District

APPENDIX I: Forest Moon Allotment Specific Objectives

The multiple use objectives under which grazing use, as stated previously will be monitored and evaluated are as follows:

a. Livestock (See Appendix II)

The short term objective will be accomplished through managing the allowable use level (AUL) by season of use to improve or maintain the desired vegetation community.

The long term objective is to improve those acres in poor or fair livestock forage condition and maintain all acres presently in good livestock forage condition by managing for those seral stages which optimize livestock forage production.

b. Wild Horses (See Appendix II)

The short term objective will be accomplished through managing the allowable use level (AUL) by season of use to improve or maintain the desired vegetative community.

The long term objective is to manage for the most appropriate seral stage to provide desired quantity, quality, and variety of forage in order to meet the requirements of the wild horses.

c. Mule Deer (See Appendix III)

The short term objective is to limit use on key species listed for mule deer to 55 percent for perennial grasses, grass-like plants, and forbs, and to 45 percent for shrubs yearlong.

The long term objective is to maintain mule deer range in at least fair habitat condition by providing diversity of forage species.

d. Pronghorn Antelope

The short term objective is to limit use on key species listed for pronghorn antelope to 55 percent for perennial grasses, grass-like plants, and forbs, and to 45 percent for shrubs yearlong.

The long term objective is to maintain pronghorn antelope range in at least fair habitat condition by providing appropriate vegetation quantity and quality.

e. Ferruginous Hawks

The short term objective is to limit use on winterfat within two miles of occupied ferruginous hawk nests to 45 percent by all animals yearlong.

The long term objectives are to maintain integrity of existing pinyon/juniper "stringers" near winter fat stands as nesting habitat, and to manage winterfat stands in mid to late seral stage.

f. Riparian Areas (See Appendix IV)

The short term objective is to limit use on wet meadows and stream riparian areas to 50% for grass and grass-like species by all animals yearlong.

The long term objective is to manage all wet meadows for late seral stage (80-85 percent grass and grass-like plants, 10-15 percent forbs, and 5 percent shrubs).

g. Wilderness Study Areas

The short term objective is to maintain/improve the current vegetation within the wilderness study area to provide future wilderness values and biodiversity.

The long term objective is to manage the vegetative community to enhance or restore the natural ecosystem.

APPENDIX II

ALLOTMENT: Forest Moon - Livestock and Wild Horse Objectives

				PRESENT SITUATION			LONG TERM OBJECTIVES **		SHORT TERM OBJECTIVES	
Study No.	Key Area Location	Ecological Site No.*	Key Species	Key Spp % Comp By Weight	Seral Stage (% of PNC)	Maintain or Improve	Key Spp % Comp By Weight	Seral Stage (% of PNC)	Allowable Use Level***	Season of Use
FMR1	T. 6 N., R. 60 E., Sec. 8 NW	028BY013NV	ORHY EULA5	ORHY 5% EULA5 92% Grasses 6% Forbs 0% Shrubs 94%	58%	Improve	ORHY 5-10% EULA5 <92%	>60%	50% 45%	Yearlong ****
FMR2	T. 6 N., R., 59 E., Sec. 11 NW	028BY011NV	ORHY ARARN	ORHY 25% ARARN 65% Grasses 33% Forbs 2% Shrubs 65%	74%	Maintain	ORHY 20-35% ARARN <65%	50-75%	50% 45%	Yearlong ****
FMR3	T. 5 N., R. 60 E., Sec. 30 NE	028BY008NV	ORHY ARARN	ORHY 5% ARARN 69% Grasses 13% Forbs 5% Shrubs 82%	54%	Improve	ORHY 5-10% ARARN <69%	50-75%	50% 45%	Yearlong ****

* Ecological sites listed here can be referred to from the U.S. Soil Conservation Service Ecological Site Descriptions. Ecological sites were revised 3/91. Data collected prior to that time was re-analyzed according to the new range site write-ups.

** This is the percent composition and seral stage that would have the desired vegetative characteristics to optimize production, quantity, quality, and variety to provide the greatest forage value for all users.

*** Allowable use levels for utilization are the short term objectives established to meet the long term composition objectives.

**** Livestock season of use is 06/01 to 03/31 but wild horses use the allotment yearlong.

APPENDIX III

ALLOTMENT: FOREST MOON - WILDLIFE OBJECTIVES

				PRESENT SITUATION			LONG TERM OBJECTIVES		SHORT TERM OBJECTIVES	
Study No.	Key Area Location		Key Species	Habitat Condition Rating		Maintain or Improve	Habitat Condition Rating		Allowable Use Level	Season of Use
FMW1 - Horse Spring KDW	T. 5 N., R. 59 E., Sec. 5, SENW		COMES EPVI PUTR2	Good		Maintain	Good		30% 45%	by 11/1 Yearlong

APPENDIX IV

Allotment: Forest Moon - Riparian Objectives

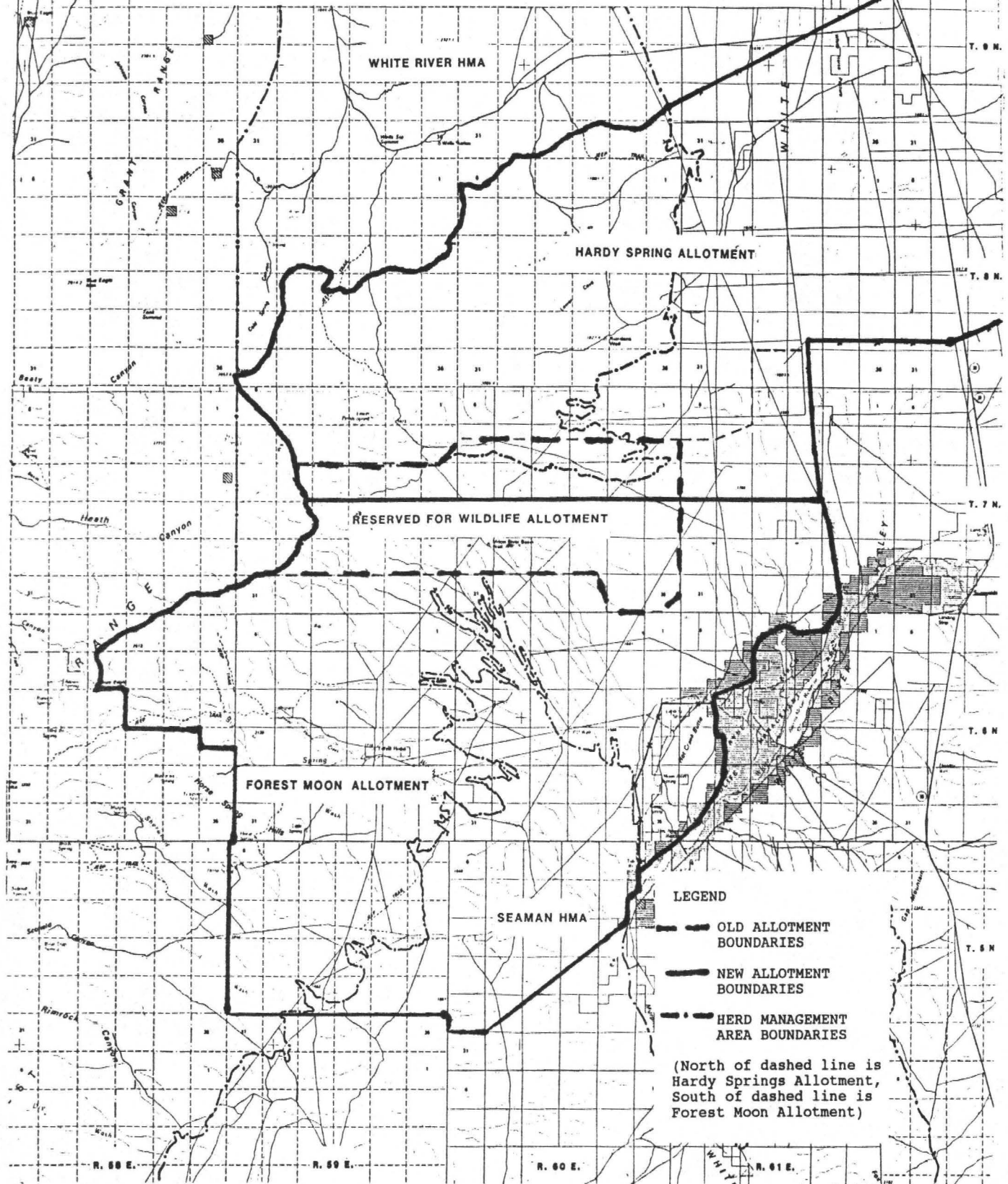
			PRESENT SITUATION	LONG TERM OBJECTIVES		SHORT TERM OBJECTIVES	
Study No.	Key Area Location	Key Species	Functioning Condition	Maintain or Improve	Functioning Condition	Allowable Use Level	Season of Use
South Horse Spring	T. 5 N., R. 59 E., Sec. 7 NWNW	Grass & grass-like species	Proper Functioning Condition	Maintain	Proper Functioning Condition	50%	Yearlong *
Unnamed Spring	T. 6 N., R. 59 E., Sec. 16 SWNE	Grass & grass-like species	Proper Functioning	Maintain	Proper Functioning Condition	50%	Yearlong *
Forest Home Spring	T. 6 N., R. 59 E., Sec. 18 NESE	Grass & grass-like species	Proper Functioning	Maintain	Proper Functioning Condition	50%	Yearlong *
Horse Spring	T. 6 N., R. 59 E., Sec. 31 SESW	Grass & grass-like species	Proper Functioning	Maintain	Proper Functioning Condition	50%	Yearlong *
Mountain Spring	T. 6 N., R. 59 E., Sec. 29 SWSW	Grass & grass-like species	Proper Functioning	Maintain	Proper Functioning Condition	50%	Yearlong *
Egan Spring	T. 6 N., R. 61 E., Sec. 8 NWSW	Grass & grass-like species	Proper Functioning	Maintain	Proper Functioning Condition	50%	Yearlong *
Little Spring (complex of 2)	T. 6 N., R. 59 E., Sec. 32 NESE	Grass & grass-like species	Proper Functioning	Maintain	Proper Functioning Condition	50%	Yearlong *

* Livestock season of use is 06/01 - 03/31 but wild horses use the allotment yearlong.

Appendix V. Water Control Management Guideline

Livestock Management System Using Water Control.		
General Area	Approximate Period of Use	Approximate Treatment Level (AUMs)
Year 1		
North Ditch System	06/01 - 10/31	1,131
South Ditch System	11/01 - 03/31	1,132
Year 2		
North Ditch System	11/01 - 03/31	1,131
South Ditch System	06/01 - 10/31	1,132
Repeat cycle starting with year 1		

NEW ALLOTMENT BOUNDARY LINE



- LEGEND**
- OLD ALLOTMENT BOUNDARIES
 - NEW ALLOTMENT BOUNDARIES
 - - - HERD MANAGEMENT AREA BOUNDARIES

(North of dashed line is Hardy Springs Allotment, South of dashed line is Forest Moon Allotment)



IN REPLY REFER TO:

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-046)

APR 26 1996

CERTIFIED MAIL NO. Z 425 081 574
RETURN RECEIPT REQUESTED

Commission for the Preservation of Wild Horses
State of Nevada
c/o Cathy Barcomb, Executive Director
255 West Moana, Suite 207A
Reno, NV 89509

Dear Ms. Barcomb:

Enclosed you will find a copy of the Final Multiple Use Decision for the Forest Moon Allotment, dated April 5, 1996. The Certified Copy, Z 425 081 634, we sent to you was returned to this office unclaimed on April 26, 1996. The first notice for delivery was April 8, 1996, the second notice was April 13, 1996, the return notice was April 23, 1996.

If you have any questions, please contact Brett Covlin of my staff at 289-1864.

Sincerely,

Alfred W. Coulloudon, Manager
Schell Resource Area

1 Enclosure

1. Final Multiple Use Decision for the Forest Moon Allotment



COMMISSION FOR THE
PRESERVATION OF WILD HORSES

255 W. Moana Lane

Suite 207A

Reno, Nevada 89509

(702) 688-2626

May 9, 1996

Mr. Alfred W. Coulloudon
Schell Resource Area
Bureau of Land Management
HC 33 Box 33500
Ely, Nevada 89301-9408

Subject: FMUD - Forest Moon Allotment

Dear Mr. Coulloudon:

The Commission for the Preservation of Wild Horses has received the Forest Moon Allotment Final Multiple Use Decision. We are uncertain how previous copies were not received by this office. As we have discussed, the Commission strongly supports the District's establishment of key management areas, key species and allowable use levels to govern management decisions affecting wild horse habitat.

In our recent comments to the Seaman Wild Horse Herd Management Area Monitoring Evaluation, the Commission supported the parameters for future decisions to establish the appropriate management level for the Seaman Herd. As you are aware, the Commission find errors in the procedural use of weight averaging or yield indexing of monitoring data that results in the compromise of overutilization data collected by use pattern mapping studies. Also, we do not support a fragmented approach to establish appropriate management levels for each allotment without some comprehensive analysis.

Please do not consider this letter a formal appeal. We would appreciate some attention to several inconsistencies throughout this Final Decision.

The Authority Section repetitiously states that the authorized officer shall make management actions to achieve management objectives. The authorized officer shall issue authorizations to achieve the management and resource condition objectives. The authorized livestock grazing use shall not exceed the livestock carrying capacity.

Mr. Alfred W. Colloudon
May 9, 1996
Page 2

Given the specific federal regulation regarding achievement of allowable use levels, why does the Forest Moon Allotment Livestock Management Decision Rationale (Page 4) state: "data will be evaluated to determine if livestock management practices as specified in this decision for the Forest Moon Allotment are meeting or making progress towards the allotment specific objectives"?

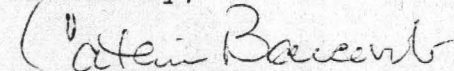
The Forest Moon Allotment Wild Horse And Burro Decision establishes an appropriate management level to "maintain a thriving natural ecological balance and prevent deterioration of range". We would recommend a similar statement for livestock.

APPENDIX I, Page 9 establishes a multiple use objective for Wild Horses. This objective specifically states that allowable use levels will be achieved by **season of use** of wild horses. The Final Decision made an adjustment in numbers to achieve allotment specific objectives. Federal regulation protects the free roaming nature of wild horses, how can season of use adjustments be applied to wild horses?

We realize that livestock can be managed to achieve allotment specific objectives or within the carrying capacity of an allotment. However, the regulations require the achievement of these objectives and not an immeasurable degree of progress. Our difficulties with the procedural methods to determine the stocking rates, may better explain the poor probability of meeting allotment objectives with past management and stocking levels.

We encourage the District to continue to monitor this allotment and make necessary adjustments as needed each year.

Sincerely,


CATHERINE BARCOMB
Executive Director