

September 20, 1994

Mr. Gene L. Drais
Egan Resource Area
Bureau of Land Management
HC 33 Box 333500
Ely, Nevada 89301-9408

Subject: Monte Cristo Allotment Evaluation

Dear Mr. Drais:

The Nevada Commission for the Preservation of Wild Horses has reviewed the draft allotment evaluation. We have the following specific comments:

Page 12, Yield Indices

Use of yield indices significantly compromises the actual observed utilization data. In years of severe drought yield indices will compute stocking rates known to cause resource damage.

Page 18, Utilization and Stocking Rate Calculations

Weight averaging observed utilization data and applying yield indices has masked the computations for an allotment carrying capacity. For example, during 1990 livestock and wild horse actual use (426 AUMs) were taken from the Monte Cristo Seeding. Use pattern mapping data showed that 80 percent of the seeding suffered "heavy utilization" or exceeded the carrying capacity. The "Proper Stocking Level AUMs" indicate the proper stocking level is 432 AUMs, which is greater than the 1990 stocking level known to cause significant damage to the seeding. Carrying capacity computations are flawed.

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Page 19, Forage Demand

Necessary adjustments or the allocation of available forage is based upon "paper cows". Forage demand is Total Preference and not the actual use data use to determine a livestock carrying capacity.

Reducing from Total Livestock Preference and from actual wild horse use is bias against horses and will not correct the resource problems of this allotment.

Please consider the comments of this Commission prior to the issuance of a final document or proposed multiple use decision.

Sincerely,

Catherine Barcomb
Director