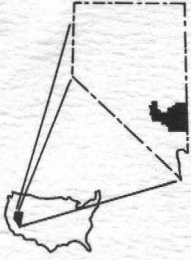


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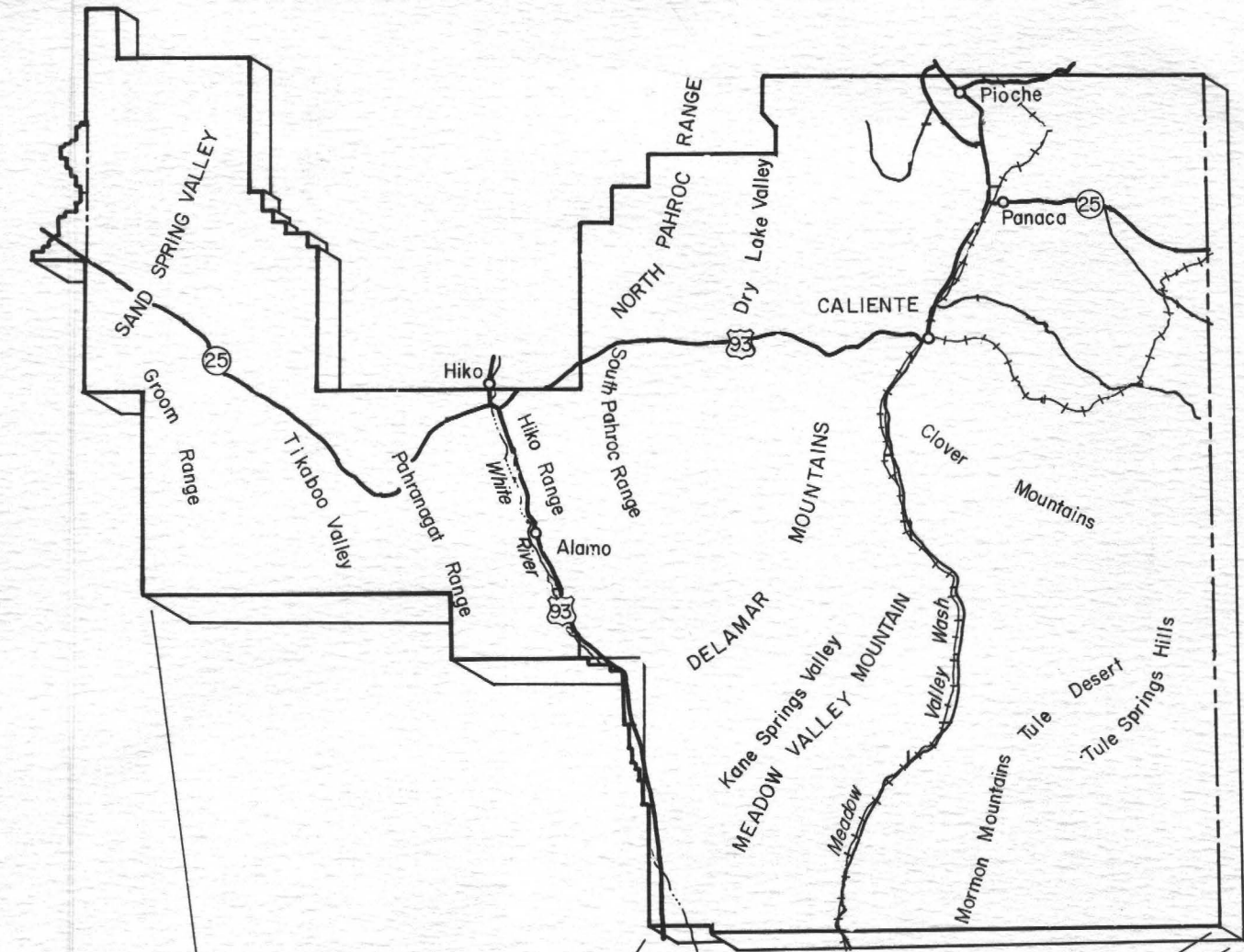


CALIENTE PLANNING AREA

RANGELAND MANAGEMENT PROGRAM

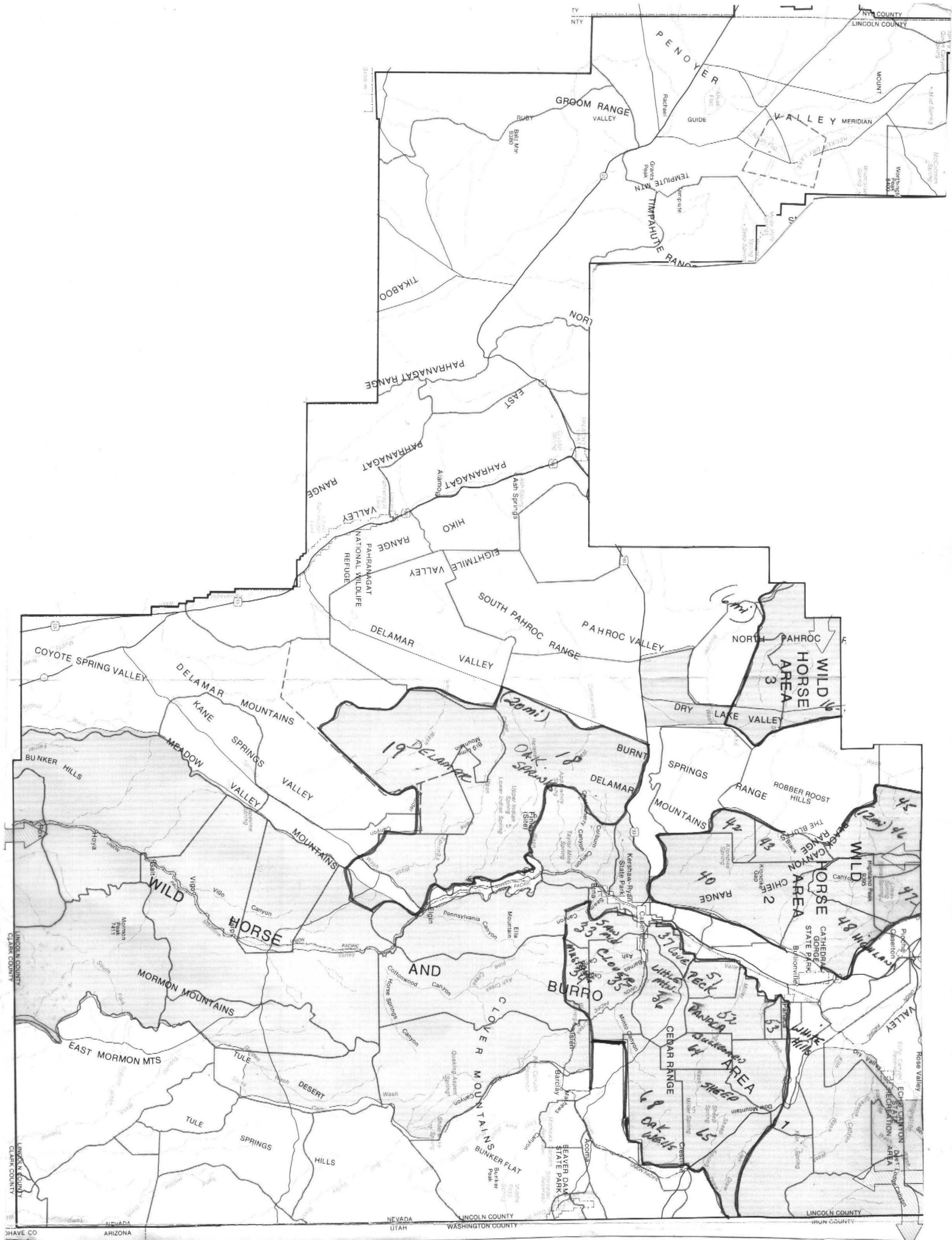


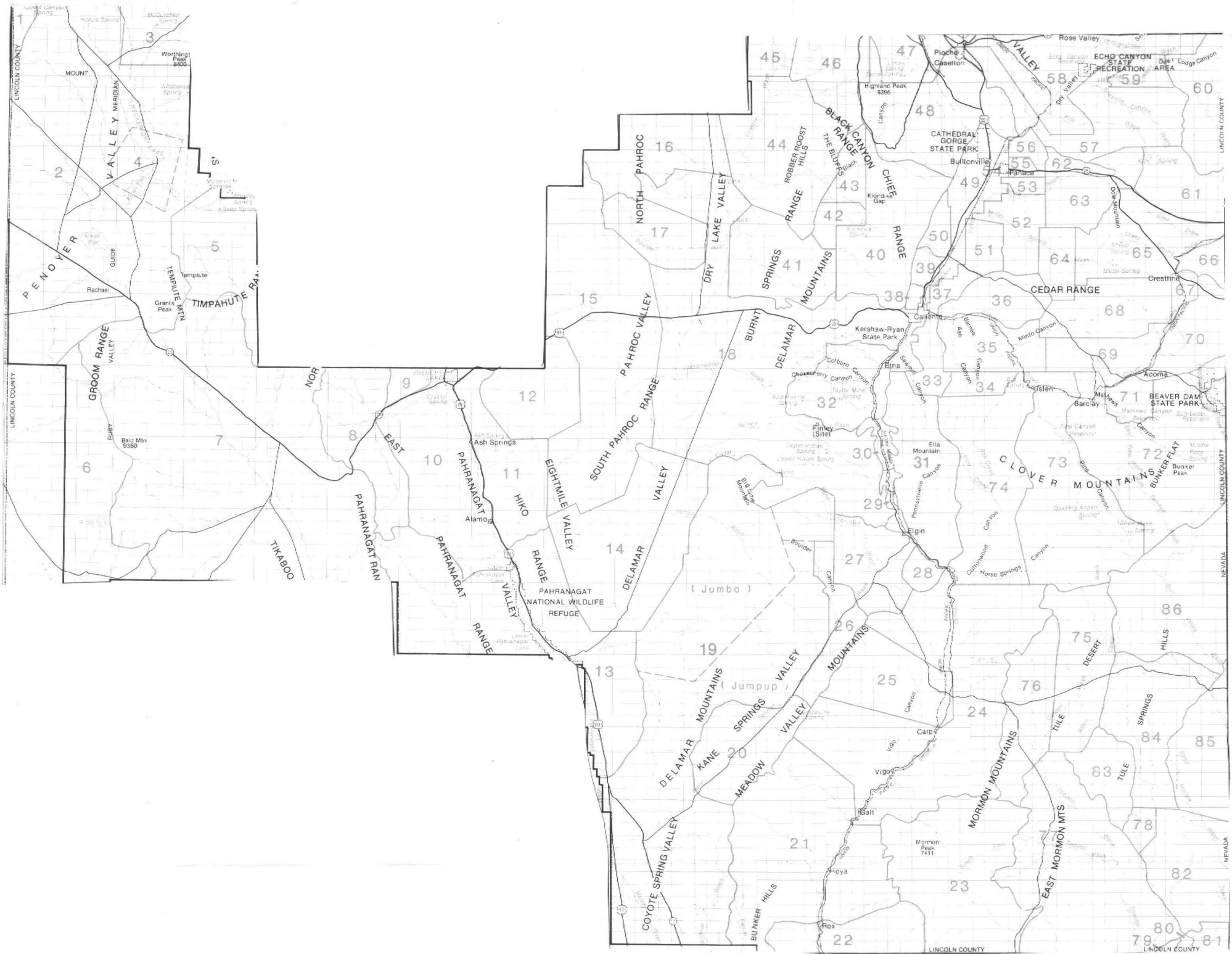
U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
LAS VEGAS DISTRICT, NEVADA
FEBRUARY, 1980



CALIENTE PLANNING AREA

LAS VEGAS DISTRICT
NEVADA





INTRODUCTION

Livestock ranching has been a way of life in the Caliente Environmental Statement (ES) area of Nevada for about one hundred years. Ranchers have developed operations dependent upon a variety of forage resources available on private lands, Forest Service lands, and BLM-administered public lands both within the Caliente area and in other areas of Nevada and Utah.

The Caliente ES area includes 3.5 million acres of which 98 percent is BLM-administered public land. There are 86 grazing allotments located in the ES area of which five are currently operating under Allotment Management Plans (AMPs).

Range surveys and their resulting adjustments in public land livestock use have been conducted by the BLM at various times between 1960 and 1976. During this period the total grazing preferences were adjusted to 187,327 Animal Unit Months (AUMs) of forage. Of this total 117,758 AUMs have been classified as active preference available for use. The balance was placed in suspended non-use. During the 1977 grazing year 77,513 AUMs of forage were used by livestock on 86 grazing allotments operated by 74 ranchers.

Other major consumptive users of vegetation have been deer, bighorn sheep, and wild horses and burros. Deer populations are believed to be slightly increasing from a record low in 1967. Historically, bighorn sheep were present in most of the mountain ranges in the ES area; presently, these animals number about 750 and are found on only four ranges. Wild horse and burro populations have been expanding rapidly in recent years; in 1977 these animals numbered 1,072 in the Caliente ES area. No specific allocations of vegetation to any of these species have occurred.

This combination of uses by livestock, wild horses and burros, and wildlife has subjected the vegetation resources in the area to grazing demands above the current forage production capabilities of the range. Livestock forage conditions indicated 689,000 acres to be in good livestock forage condition; 1,375,000 acres to be in fair condition; and 512,000 acres to be in poor condition (see Table C). Major consideration was given to improving the forage condition and vegetation production of the range in this rangeland management program.

In September 1979, a Final Environmental Statement (FES) on livestock grazing in the Caliente area was completed. The FES analyzed the probable environmental impacts of the proposed action and alternatives from which this rangeland management program was derived.

THE PROGRAM

What It Is

With the completion of the Caliente Final Environmental Statement, the BLM has developed management guidelines for the area - the Rangeland Management Program. This program incorporates appropriate parts of three separate ES alternatives - the Proposed Action, Alternative Six (Reduced Management Intensity), and Alternative Seven (Locally Suggested Vegetation Allocation Program). In this way, it is felt that the program proposed is the most environmentally preferable and responsive to the mandates of the Federal Land Policy and Management Act and the National Environmental Policy Act, as well as to major social economic and land use objectives.

The substantive elements of the program to be implemented are as follows:

Livestock

1. Initiate Allotment Management Plans (AMPs) implementation within five years as specified in Alternative Six (Reduced Management Intensity) with the following exceptions: a) Rabbit Springs would have no AMP; b) Buckhorn and Lower Lake allotments would be combined into one AMP; c) Enterprise allotment would have an AMP. There would be 17 new AMPs consisting of combinations of 38 current allotments. Two existing AMPs would continue to be managed as at present. Table A summarizes management intensity.

TABLE A
Summary of Management Intensity and Allocation Levels
1980

	<u>Acres</u>	<u>Allotments</u>	<u>AUMs</u>
AMP*	2,568,691	40	62,031
Non-AMP	825,358	38	12,390
No Livestock Grazing	101,755	8	---
Total	3,495,804	86	74,421

* 19 AMPs consisting of combinations of 40 allotments

2. Establish proper periods-of-use for livestock by developing AMPs and by restricting use on non-AMP areas to provide a two-month no-grazing period in the spring. This two-months-off period for livestock is recommended to enable key forage species to meet their biological needs for development and continued reproduction. Grazing management systems on AMP allotments also

2568691
+ 825358

3394049

would be established to provide periods of rest to lessen adverse effects on vegetation. Livestock periods-of-use would be increased on four allotments and further restricted on six allotments.

3. Adjust livestock grazing to its proper capacity as specified in the proposed action as mitigated with the following exceptions:
 - a) allow consideration of snow and water hauls in licensing additional AUMs under temporary non-renewable permits on winter sheep allotments; b) allow continued livestock grazing on Ash Flat allotment with 43 AUMs of perennial forage allocated as specified in Alternative Seven; c) allocate 480 AUMs in Wild Horse and Burro Area 3 to livestock in the Rattlesnake and Oak Springs allotments. Table B compares the 1980 planned allocation with 1977 use and possible future allocations.

TABLE B

Comparisons of Forage Allocation
(1977, 1980, 1990, 2015)

	<u>Livestock AUMs</u>	<u>Wildlife AUMs</u>	<u>Wild Horse and Burro AUMs</u>
Current Use (1977)	77,513	--- <u>a/</u>	12,624
Planned Allocation (<u>1980</u>)	74,421	15,104	5,476
Possible Future Allocation (1990)	105,000	17,000	5,800
Possible Future Allocation (2015)	115,000	18,000	6,700

a/ Current numbers of wildlife unavailable

4. Establish range improvements and vegetation manipulation necessary for proper grazing management as specified in Alternative Six, with the following modifications: a) Rabbit Spring allotment would have no improvements; b) Buckhorn and Lower Lake allotments would have additional improvements. Range improvement projects would consist of: 230 miles of fencing; 20 spring developments; 188 miles of water pipelines; 90 water troughs; 26 reservoirs; 13 wells; 28,780 acres of mechanical treatments; and 48,320 acres of prescription burning. Total costs are estimated to be about \$2.8 million.

Wildlife

1. Allocate sufficient vegetation within vegetation capacity to meet "reasonable numbers"* of wildlife as specified in the proposed action (15,104 AUMs total - deer: 12,748 AUMs, bighorn sheep: 2,308 AUMs, antelope: 48 AUMs). This would be the first time that vegetation allocations would be made for specific species in the ES area.
2. Implement vegetation treatments associated with AMPs in wildlife habitat areas with insufficient wildlife forage to meet "reasonable numbers".
3. Implement a Habitat Management Plan on the Mormon Peak Allotment to increase bighorn sheep populations. The locations and types of water developments that could be constructed to allow habitat expansion and the necessity of fences to prevent livestock movement into bighorn crucial areas would be determined. Implementation would minimize present and potential conflicts between bighorn sheep and livestock in the Mormon Peak area.
4. Implement a Habitat Management Plan in Deer Winter Range 5 where critical deer forage shortages are occurring. Vegetation manipulations and water developments designed primarily to benefit deer and other wildlife would be constructed. Modifications to existing projects - e.g., lowering the top wire of fences to allow deer passage, adding bird ladders to livestock troughs - would also be completed. Implementation would reduce deer depredation upon private land in Rose Valley while allowing deer to increase to "reasonable numbers". In addition, creating new waters would allow habitat expansion and increased forage for many other wildlife species.

Wild Horses and Burros

1. Allocate sufficient vegetation to wild horses and burros as specified in the proposed action and Alternative Seven. Total allocation to wild horses and burros will be 5,476 AUMs -enough to support an average population of about 450.
2. Excess wild horses and burros would be placed in the custody of private persons, organizations, or other agencies.

* "Reasonable Numbers" defined as: that number of animals which the wildlife management agency is striving to maintain within a given planning unit under a multiple use concept on a sustained yield basis.

3. Develop and implement five Wild Horse and Burro Management Plans which would emphasize small healthy herds (between 38 and 170 animals) rather than allow them to increase in numbers exceeding the capacity of the resource. The plans would identify where improvements may be necessary to allow wild horses and burros to use the designated habitat areas. Such improvements could include development of dependable yearlong water sources where none presently exist, vegetation manipulations to improve forage quality, removal of fences that presently restrict wild horse movement, and construction of fences to prevent horse movement into areas designated for other uses.
4. Fence five miles of riparian vegetation along Clover Creek to eliminate adverse impacts from yearlong use by wild horses.

Elements identified as mitigating measures in the Final Environmental Statement for the rangeland management program are: 1) monitor endangered plant species; 2) limit livestock use on Mormon Peak allotment to current use levels until a Habitat Management Plan for bighorn sheep is developed; 3) fence five miles of riparian vegetation along Clover Creek to eliminate adverse impacts from yearlong use by wild horses; 4) develop and implement Herd Management Plans and Allotment Management Plans on Deer Winter Range 5 where deer forage shortages are occurring; 6) provide for a three year period for livestock operators with yearlong use to adjust to periods-of-use requiring two months of no grazing in the spring.

The rangeland management program described in this publication is a dynamic program that is subject to change. Further analysis of range improvement projects may modify some of these proposals. Monitoring and data collection systems, wilderness inventories, endangered species and cultural resource clearances will all have impacts on actual on-the-ground implementation of this program. Elements of this program not analyzed in the Final Environmental Statement would be analyzed in Environmental Assessments before implementation. External changes which result in changes in land use within the ES area would be considered. One such change is the proposal to establish a portion of the MX missile system on public lands in the ES area. This could cause significant modifications in this rangeland management program.

What It Does

It is felt that this rangeland management program is the optimum combination of proposals from the proposed action and alternatives. It incorporates the features of protection and enhancement of wildlife and wild horse and burro habitat as well as protection of the soil and vegetative resources. Further, the program provides for allocations to domestic livestock that would minimize adverse impacts

to local ranching operations.

Total soil loss should be reduced by about nine percent per year by 2015. Fifty-seven miles of riparian vegetation should improve. Livestock forage condition of the range should improve by the year 2015 as shown in Table C.

TABLE C

Present and Future Range	Livestock Forage Conditions by Acreage		
	<u>Acres Good</u>	<u>Acres Fair</u>	<u>Acres Poor</u>
Present (1976)	689,000	1,375,000	512,000
Future * (2015)	1,119,000	1,013,000	444,000

* Forage condition should improve throughout this period, much of the improvement should occur prior to 2015.

Livestock forage available at the start of the program would be 74,421 AUMs, which is 96 percent of the present level of use. By 2015, it is expected that there may be 115,000 AUMs allocated to livestock. Reasonable numbers of bighorn sheep (1,098) and mule deer (8,820) are expected to be achieved by the year 2015. Wild horse and burro numbers would be decreased to about 450 by 1981. Possible future allocations by 2015 would support a population of about 560. Ranch income would be decreased by about \$67,000 per year below 1977 levels in the short term; however, by 2015 it is expected to increase by about \$71,000 per year above 1977 levels. This estimated increase in future income is based on the assumption that ranchers would continue to use only a portion of the livestock forage available.

Significant beneficial impacts that would result from implementation of this rangeland management program are summarized in Table D.

TABLE D

Summary of Long-Term Beneficial Impacts

Resource Element	Impact	Cause for Change
Soil Sediment Yield	Decrease of about 200,000 tons per year (9%) by 2015	Increased Vegetation
Riparian Vegetation	Increased vegetation on 57 miles of streambank	Decreased Grazing Pressure
Livestock Forage Condition	Decrease in poor and fair condition range of 430,000 acres and increase in good condition range of 430,000 acres by 2015	Decreased Grazing Pressure, Increased Management Intensity Vegetation Manipulation
Livestock Forage Allocation	Possible active use by 2015 would be about 115,000 AUMs, a 47% increase over 1977 licensed use	Decreased Grazing Pressure, Increased Management Intensity Vegetation Manipulation
Bighorn Sheep Populations	Reasonable numbers-1,098 would be achieved by 2015	Decreased competition for space, water, and forage
Mule Deer Populations	Reasonable numbers - 8,820 would be achieved by 2015	Vegetation manipulation, water developments, and decreased competition for forage
Ranch Income	Increase of about \$71,000 per year by 2015	Increase in vegetation production

ALTERNATIVES IN THE ES

1072
12
2144
1072
12864
12 | 5956
4

Environmental Statement Proposed Action

The proposed action considers adjusting livestock grazing from 77,513 AUMs used in 1977 to 74,293 presently suitable AUMs in 1980. Adjustments in livestock numbers would be initiated in 1980 to be fully implemented within three years after the final ES is filed. Wild horse numbers would be reduced by 53 percent from 1,072 to 497 animals (5,956 AUMs) in 1980, and management would be intensified. Twenty-seven AMPs would be developed and implemented by 1990. Approximately 400,000 acres of vegetation would be evaluated for treatment to provide an additional 40,000 AUMs of forage. Proper periods-of-use (no grazing from April 1 to May 30 except in areas with implemented AMPs), numbers, and kind of livestock would be established. Range improvement cost is estimated to be \$9.6 million.

Required forage to satisfy wildlife management levels ("reasonable numbers") would be provided when possible. A total of 17,926 AUMs would satisfy wildlife.

The vegetation allocations of the proposed action for wildlife, wild horse and burro (with the exception of one area), and periods-of-use recommendations for livestock on 74 allotments from the proposed action were incorporated into the range management program. The level of management intensity was not selected because estimated costs were expected to be greater than anticipated benefits.

Alternative One: No Action (Continuation of Present Management)

Under this alternative, livestock use from 1980 to 2015 would remain stable at 77,513 AUMs, wild horse and burro numbers would be controlled at 1,072 requiring a stable 12,864 AUM demand through 2015; wildlife AUM reasonable numbers (17,926) would represent demand from 1980 to 2015.

This alternative was eliminated because it failed to respond to the problems and issues of multiple use management in the Caliente area and the vegetation resource would be over-obligated.

Alternative Two: Elimination of Livestock, Wild Horse and Burro Grazing

Under this alternative all livestock, wild horses, and burros would be removed from the area, allowing maximum vegetation utilization by wildlife. All vegetation would be available for wildlife, watershed protection, and recreation use. The five AMPs would be terminated. Range improvements would not be maintained or constructed unless

necessary for other programs. Wildlife forage would be maximized at 44,179 AUMs - the total wildlife forage capacity. It is assumed wildlife populations would increase to the forage capacity level and remain stable through the analysis period. Livestock AUMs would be reduced from 77,513 AUMs used in 1977 to zero in 1980. Wild horse and burro populations would be reduced from 1,072 in 1977 to zero in 1980.

This alternative was eliminated because it failed to provide for multiple use management and would result in severe adverse economic impacts.

Alternative Three: Minimum Constraints on Wild Horses and Burros

Under this alternative, wild horse and burro populations would be maximized within the capability of existing forage. All available forage within the present wild horse and burros use areas (suitable and potentially suitable with water development, excluding competitive wildlife AUMs) would be allocated to wild horses and burros. In allotments receiving excessive horse use above their forage capacities, animals may be relocated to other wild horse use allotments which produce the required forage amounts. This would continue until all wild horse use allotments are being used at their 1980 forage capacities (34,361 AUMs or 2,863 animals compared to 1,072 in 1977). There would be no expansion of present wild horse and burro habitat. Livestock AUMs would be reduced from 77,513 used in 1977 to 54,188 allocated in 1980. Possible long-term allocation would be 96,870 in 2015. Yearly wildlife allocations would be 15,204 AUMs from 1980 through 2015.

This alternative was eliminated because of severe impacts to many of the ranching operations and lack of local support. Further, it is not multiple use management.

Alternative Four: Restricted Periods-of-Use by Livestock

This alternative provides low intensity grazing management by eliminating livestock grazing during the March 1 through July 15 growing season on perennial and ephemeral-perennial ranges. Grazing would be permitted on ephemeral forage when it is available. Total allocation to livestock would be reduced from 77,513 in 1977 to 59,387 in 1980. No vegetation treatments and no range improvements would be implemented, resulting in a livestock allocation of 113,658 AUMs in 2015. Wild horses and wildlife would be allocated AUMs and managed as in the proposed action. This would result in a reduction in wild horse and burro populations from 1,072 in 1977 to about 500 in 1980. Wildlife would be allocated 15,104 AUMs.

This alternative was eliminated because of severe impacts to many livestock operations, particularly those with limited acreage of

private land or yearlong grazing on public lands. Alternative sources of livestock feed would be difficult to obtain during the restricted period.

Alternative Five: Reduced Levels of Livestock Grazing

This alternative allows for grazing use at 50 percent of the proposed 1980 vegetation allocation permitted under the proposed action, and livestock use would remain at this level until 2015. Livestock allocations would decrease from 77,513 AUMs used in 1977 to 37,163 allocated from 1980 to 2015. Periods-of-use are identical to those of the proposed action. Vegetation treatments would not be implemented. Wild horses, burros, and wildlife would be allocated AUMs and managed as in the proposed action. This would result in a reduction of wild horse and burro populations from 1,072 in 1977 to about 500 in 1980. Wildlife would be allocated 15,104 AUMs in 1980.

This alternative was eliminated because it fails to respond to problems and issues of multiple resource management, and it would result in severe impacts to many livestock operations.

Alternative Six: Reduced Management Intensity

This alternative would allocate forage as described in the proposed action. Livestock allocations would be reduced from 77,513 used in 1977 to 74,293 in 1980. Expected long-term allocation would be about 115,000 AUMs. Wild horses and wildlife would be allocated AUMs, and managed as specified in the proposed action. Wild horse populations would decrease from 1,072 in 1977 to about 500 in 1980. Wildlife would be allocated 15,104 AUMs in 1980. Periods-of-use would be identical to those in the proposed action. Management intensity would be reduced from 27 AMPs in the proposed action to 16 AMPs for this alternative. Range improvement projects would be completed at a greatly reduced level. Implementation of intensive management systems would be completed on an accelerated schedule. Total cost of range improvements for this alternative is estimated to be \$2.6 million.

Range improvements and management intensity for this alternative were incorporated into the range management program. The cost of improvements for this alternative is within expected manpower and budget limits.

Alternative Seven: Locally Suggested Vegetation Allocation Program

This alternative would allocate 81,868 AUMs to livestock in 1980 compared to 77,513 used in 1977; 2,308 AUMs to wild horses and burros (enough to support a population of 192 - compared to 1,072 in 1977); and 15,109 AUMs to wildlife. Periods-of-use would be identical to those under the proposed action on 59 allotments, while

periods-of-use would be modified on 27 allotments to allow more grazing during the spring. Management intensity would be the same as under the proposed action on 77 allotments. On five allotments it would be changed from no grazing to non-AMPs. Four allotments designated as non-AMP under the proposed action would have AMPs developed and implemented, if feasible. Adjustments from the the proposed action in range classification would occur on seven allotments.

The provisions in this alternative for increased sources of water on sheep winter-use areas, continued livestock grazing in the Meadow Valley area, and reallocation of forage in Wild Horse and Burro Area 3 to livestock were incorporated into the range management program.

PUBLIC INVOLVEMENT

This section summarizes the public involvement schedule that accompanied the planning, environmental analysis, and decision-making phases of the Caliente grazing program:

Management Framework Plan

Planning and development of the Caliente Management Framework Plan (MFP) was initiated in 1978. The MFP public participation plan was conducted concurrently with the ES plan.

Draft Environmental Statement

October, 1978 - Statewide news release from Nevada State Office of the BLM in Reno issued the initial announcement of plans for preparation of an ES on the Caliente area.

February 20, 1979 - Letter issued from the Las Vegas District Office announcing the assembly of an interdisciplinary team for writing of the Caliente ES was sent to public interest groups. The letter was accompanied by a news release and map of the Caliente resource area.

February 27, 1979 - Notice of Intent to prepare the Caliente ES was published in the Federal Register (Vol. 44, No. 40, p. 11129).

March, 1979 - Update and progress reports on the Draft ES were presented (as part of MFP briefings) to the Nevada Clearinghouse and Congressional staff, as well as the Nevada Legislature's Agriculture Committee.

May 25, 1979 - Draft ES filed with the Environmental Protection Agency and made available to the public (File No. INT DES 79-28).

May 31, 1979 - Federal Register notice and national news release from the Department of Interior announced availability of the Draft ES and the beginning of the 45-day public review period.

June 1, 1979 - Statewide news release announced public hearing dates and availability of Draft ES.

July 10, 1979 - Public hearing on the Draft ES in Caliente, Nevada; 60 persons attended, 16 gave testimony.

July 11, 1979 - Public hearing on Draft ES in St. George, Utah; 10 persons attended, 6 presented testimony.

July 12, 1979 - Public hearing on Draft ES held in Las Vegas, Nevada; six persons attended, 2 gave testimony.

July 16, 1979 - End of 45-day public review and comment period; 40 comment letters received.

Final Environmental Statement

September 21, 1979 - Final ES filed with the Environmental Protection Agency and made available to the public (File No. INT FES 79-44).

September 26, 1979 - Federal Register notice of availability of FES for Caliente (Vol. 44, No. 188, p. 55441.)

September 28, 1979 - BLM statewide news release announced availability of Caliente FES.

ACTION PLAN

Administrative Actions

It is the goal to have intensive grazing management systems on 19 proposed Allotment Management Plans (AMPs) on combinations of 40 existing allotments; to have 38 non-AMP allotments; to have six allotments totally allocated to wild horses; and to have no grazing on two allotments. By allotment, the following would be established:

1. Period-of-use for each kind of livestock
2. Proper livestock grazing capacity
3. Allocation of forage to meet management goals for wildlife and wild horses
4. Proper grazing system for each allotment
5. Necessary range improvements needed to fully implement the grazing system
6. Establish a period of two months of no grazing during the spring on non-AMP allotments.
7. Initiate Wild Horse and Burro Removal and complete it within 2 years.
8. Complete wildlife allocation to available capacity.

Provide for a three-year period to phase yearlong grazing operations to the recommended two-months-off period. Adjustments in livestock grazing use would be worked out individually with the livestock operators prior to issuance of formal decisions. All proposed AMPs would be written and implemented in six years.

Related Actions

The Caliente rangeland management program includes implementation of the following programs.

- Management Framework Plan multiple-use recommendations
- Habitat Management Plan for Mormon Peak allotment
- Habitat Management Plan for Deer Winter Range 5
- Wild Horse and burro management plans
- Protection of riparian vegetation by Clover Creek fencing

Range Improvement Projects

A variety of range improvements and vegetation treatments will be necessary to achieve the goals and objectives of the Caliente grazing program. These improvements, which are estimates based upon professional judgment and analysis, include the following projects: 230 miles of fencing; 20 spring developments; 188 miles of water pipelines; 90 water troughs; 26 reservoirs; 13 wells; 28,780 acres of mechanical treatment; 48,320 of prescription burning.

Grazing Use Adjustments

Adjustments in grazing use, both upward and downward, will be extensive. Although the total change between current use and the programs allocation amounts to about four percent, there will be a wide variation in adjustments on individual allotments - ranging from a 100 percent decrease to a 500 percent increase from 1977 licensed use. Of the total 86 allotments, 37 will have decreases from 1977 licensed use to the 1980 allocation, 19 will be at the same level, and 30 will have increases.

Appropriations

Development of range improvement facilities and grazing management systems are based on current appropriations, and the rate of development will be subject to change in future appropriations.

Successful implementation and monitoring will be dependent upon securing adequate funding and manpower to accomplish the tasks outlined.

Monitoring

A monitoring system will determine the effectiveness of the rangeland management program. Monitoring studies would be implemented in 1980 and conducted at regular intervals. Livestock, wildlife, and wild horse and burro grazing use will be monitored by studies which measure changes in plant composition and ground cover; actual grazing use, vegetation utilization, range condition and trend, and climate analysis (BLM Manual, section 4413.3). Additional monitoring of wildlife habitat, aquatic habitat, riparian vegetation, endangered plants, and watershed will be conducted as appropriate.

Data from these studies will be evaluated to determine the effectiveness of present management and to assist in making future adjustments.

If monitoring and evaluation determine that specific management objectives are not being met, management modifications could include changes in management intensity, the grazing system, livestock numbers, and periods-of-use, or any combination of revisions. An Environmental Assessment would need to be completed before any change could be effected. Temporary adjustments in livestock grazing use could be made in periods-of-use during drought or other emergencies.

ELY

12-31-80



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

IN REPLY REFER TO

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NR02

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Nevada State Office
300 Booth Street
P.O. Box 12000
Reno, Nevada 89520

DEC 31 1980

Dawn Y. Lappin
Director, Wild Horse Organized Assistance, Inc.
P.O. Box 555
Reno, NV 89504

Dear Ms. Lappin:

1 { The following responds to the questions raised in your letters of September 30 and November 18, 1980, regarding the management of wild horses in the Caliente Planning Unit. I regret the delay in answering your questions; however, the time was needed for research and for the meeting between you and Las Vegas District Manager Kemp Conn which occurred November 24, 1980.

2 { Your letter of November 18 asked how the Caliente EIS complies with "PL 92-195, NEPA, FLPMA, and PRIA." Strictly speaking, an EIS need comply only with NEPA. An EIS is one of the tools used to reach a decision; it is not the decision. The decision, however, must comply with various laws affecting public land management, including the ones you cite. Therefore, to be more responsive I will address your questions in terms of the Caliente MFP Step 3 decisions.

I'll begin with the citations from the Wild Horse and Burro Regulations contained in your letter of November 18th:

3 { 1. 43 CFR 4700.0-5(b): The MFP decisions process recognizes the approximate 1971 ranges of these animals (MFP Step 1-WH/B-1.1). Adjustments were made to resolve resource conflicts and reflect public comment. In two areas proposed for horse use only, Clover Creek and Little Mountain, there was insufficient forage for dual (livestock and wild horses) use and that available was given over to the horses (43 CFR 4730.3). Because of a critical resource situation in the Mormon Mountains and Meadow Valley Range we could not manage a viable herd. The multiple use decision (MFP Step 3) was to eliminate wild horses from the area.

2. 43 CFR 4700.0-5(d): Based on our planning process decisions (see above), which did consider all uses present in the wild horse areas, (see the separate, 35-page multiple use analysis of the situation in WH/B-1.1, MFP Steps 1,2, and 3) certain numbers were declared excess.

4 { 3. 43 CFR 4700.0-5(k): I do not understand your question and I am unsure of how to respond. The question appears to ask how the Caliente EIS complies with "malicious harassment." The Caliente EIS does not favor, encourage, support or even address the issue of malicious harassment.

5 { 4. 43 CFR 4700.0-6(k): A review of the wild horse analysis indicates the animals were given the full and balanced consideration called for by this section of the regulations. It is instructive to note that until this plan was developed, and these decisions made, there was little Bureau management of wild horses. This posture has actually permitted the animals to expand their estimated 1971 population in the Caliente Area. They, in fact, were not being considered "comparably" with other resources, but given a free rein the others lacked. As a result, the conflict among resources grew dramatically. These decisions are a first step in developing the balanced ecological situation which is our overall management objective.

6 { 5. 43 CFR 4730.1(a): We conducted wild horse counts in 1973, 1974, 1975, and 1977 in the Caliente Area. While these are not at the sophisticated level called for in the 1979 regulation amendment, they did provide an essential data base. More data is being gathered. The roundup last summer provided additional data to be fed into that base. There is now a wild horse and burro specialist assigned in Caliente who will be conducting additional studies. It will not occur overnight, but our direction is clearly towards achieving the level of inventory called for in the regulations.

7 { 6. 43 CFR 4730.1(b): I feel this was clearly accomplished in the previously mentioned MFP analysis.

7. 43 CFR 4730.2: Our aim in wild horse management is to conduct it at "minimal feasible levels." At the same time, we have other management considerations in the same areas in which horses are located. As the regulations state, we will design and construct management facilities, such as fences, to maintain the herds' free-roaming characteristics "to the extent possible" (Emphasis mine.)

8 { 8. 43 CFR 4730.3: The Caliente planning process determined optimum numbers of wild horses in the planning unit, based on the aforementioned MFP analysis. Because we were required to balance the forage demand with grazing capacity, where wild horses were to be present, that amount of forage necessary to sustain that herd was allocated to it. By definition, that amount of forage was not available to livestock. On five allotments, no forage was allocated to livestock.

9 { 9. NEPA: The Caliente MFP 3 decisions provide for all users of the forage resource. No use, per se, is eliminated from the planning unit. Thus, natural aspects of our national heritage are preserved in Caliente in a diverse environment.

10 } During the Caliente planning process and the development of the EIS, all interests were given equal and ample opportunity to become involved--in person, by letter, or by phone. A broad spectrum of groups, including several concerned about wild horse management, did respond to our various documents and requests for comment. To say that the livestock permittees had exclusive access to the Bureau is inaccurate.

While I don't condemn resolution of conflict through litigation, I would want to reserve it for the final solution to a clear impasse. We can all be more effective in our common objective--good resource management--by working together as cooperators rather than litigating as adversaries.

11 } Regarding the numbers of livestock, we plan to implement that decision--both reduction and increases--over a five-year period. We now have the latitude to accomplish our wild horse adjustments over the same time span. As a practical matter, incomplete funding, lack of full manpower, and the inherent difficulties in capture operations will probably result in less than total removal of horses from any given area. Thus, through our monitoring program, we might in the future be able to modify the MFP decision, based on new data.

Regarding other remarks in your letter of November 18:

12 } 1. The purpose of the proposed action evaluated in the Caliente EIS, and our range management objective, is to stabilize "the basic soils resource and vegetative resource." These are the essential resources of the range. The demands on these resources must be balanced with their capacities, otherwise the entire eco-system is doomed. Thus, forage capacity must be properly allocated among users to promote the stabilization being sought. The proposed action was ultimately one of eight alternative ways of achieving that balanced allocation, all of which were analyzed in the EIS.

13 } 2. We used the 1977 actual use figure for livestock because it was more readily retrievable as a precise figure from our grazing records. We did consider use of several years' average, but experience indicated years prior to 1977 were atypical of the recent historic usage. In our judgment, the year 1977 gave us a more accurate reflection of livestock demand, the drought notwithstanding. On the other hand, our horse counts indicate that from 1973 through 1977 there was a dramatic increase in the numbers and ranges of wild horses.

3. It is clear our data base on wild horses is not yet at the level we want it. We are confident that it is sufficient to make

the MFP 3 decision. Moreover, our implementation strategy will provide information to enhance that data base and permit refinements of the MFP 3 decision where appropriate.

14 } The information available to us now is adequate to design grazing systems which will improve the forage resource without detriment to the grazing users. It is unlikely that any action we take--other than total removal--will radically affect horse population. In addition, studies built into such systems would allow for adjustments of the system to compensate for any unforeseen, undesirable trends in any of the forage users populations.

Table 2-18 in the Caliente EIS is a comparison of diet composition based on fecal analysis. Perhaps you are referring to another table. This question requires clarification for us to answer.

15 } 4.(a) We have no assurance that a particular level of funding will be made in the range program. It is reasonable to assume that funds will be made available by Congress to adequately manage the program. We may have to use some innovative management to fully implement our program when funding is below the ideal level. You are aware, I presume, that at least 25% of grazing fees paid by the operators in Las Vegas District are returned to the district as range improvement funds. It is our policy that such improvements benefit all foragers.

16 } (b) We would hope to improve our working relationships with all interest groups. We intend to accomplish this by giving all parties opportunity to participate in our planning and decision-making. The trips to Reno by our Las Vegas District Manager and his staff are attempting to do that. While we are committed to offering the opportunity for participation, we hope interested parties will plan their participation wisely so that programs can move forward state-wide in a timely and efficient manner. I don't mean to discourage participation, just to point out there are many different programs working simultaneously.

(c) Wildlife forage in Caliente was allocated to meet reasonable numbers of deer, bighorn sheep, and antelope identified by the Nevada Department of Wildlife. Where wildlife forage was insufficient, suitable forage used by both livestock and wildlife was allocated to wildlife. In one area, Deer Winter Range 5 (see map facing page 2-30, Caliente EIS), there were insufficient amounts of either type of forage to satisfy the demand. It was not possible to meet reasonable numbers in that one area.

5. The range survey team only developed the total livestock AUMs which were suitable and available on each allotment. Both livestock and wild horse demand had to be satisfied from that total. The allocation decision was made by the district manager

based on the MFP-2 analysis in WH/B1.1 (previously mentioned), the Caliente EIS, and public comment from both the EIS and planning processes.

6. The purpose of developing additional water is to spread out current use and to eliminate, as much as possible, concentrated and deleterious use near present water sources. Grazing will be more evenly distributed. In fact, water-related AUMs will not be allocated until the relevant water is in place. We see no conflict between this statement and that on p. 2-44 concerning horse use of higher elevations in the summer. Moreover, there is no current evidence of spatial conflicts between wild horses and livestock which would prevent them from grazing the same range simultaneously.

17 { 7.(a) No fencing is planned for horse use "only" areas. In dual use areas (horses and livestock) some fencing is necessary to properly manage livestock use. Such fencing, as indicated in this paragraph, would take full consideration of and provide for wild horse needs.

(b) Disturbance could occur from many causes; such as, fire, construction, mining, etc.

18 { (c) Cooperative agreements are the normal vehicle. Our policy is to require multiple use application of such water. In many cases, if there is no cooperative agreement there probably would be no facility for either livestock or wild horses. It is interesting to observe that many waters and associated facilities are currently maintained by operators. 2-45

(d) "Relocate" here is used in the sense it is used in 43 CFR 4740.4.

8. MFP-3 Decision (WH/B-1.6) identified an area encompassing more than 30,000 acres in the Little Mountain Horse Management Area as a potential site for vegetative manipulation. More than 70,000 acres planning-unit-wide have been identified with similar potential. In the latter case, the manipulation objective would be designed to benefit all foragers.

19 { 9. Table 1-9 in the Caliente EIS accompanied the proposed action and was developed, as stated, as a scenario for EIS analysis. In fact, the AMP, Range Improvement and Vegetative Manipulation scheme selected in the MFP-3 decision is that shown on Table 8-46 beginning on page 8-105 in the Caliente EIS. This was the development scenario used in Alternative Six. Yes, it is likely that the \$2.8 million cost of this scenario will increase, from inflation alone, if nothing else. Whether that would invalidate an AMP is questionable. In any event, this will be subjected to further refinement through coordinated resource management and planning. Other means could be used to attain an AMP's objectives. We would certainly seek out those

alternatives. In developing the AMPs, wild horse needs would be fully considered. In fact AMPs and HAMPs, (horse area management plans) will have to thoroughly dovetail to insure that all actions are compatible.

10.(a) As explained above, the figures in Table 1-10 are not those selected for the decision. One reason they were not selected is the \$9.6 million price tag, which we felt was unrealistic. We believe that \$2.8 million is a more attainable objective.

20 { (b) If all manpower and funds are withheld, no monitoring will get done. But that's an extreme occurrence we don't foresee happening.

21 { (c) We did not state in any Caliente planning or EIS documents that year-long use by horses made management impossible. However, availability of both summer and winter ranges was a criteria in selecting horse management areas. One of the planning objectives in Caliente was to identify proper season of use on all allotments so that adequate time is available for plant growth and development.

22 { (d) We have never proposed to remove all wild horses from the planning unit. Our decisions do reflect some horse removal areas. The 5-year implementation and accompanying monitoring may afford us the opportunity to increase horse presence in the planning unit, if the data so warrants. This approach, we feel, satisfies our responsibility to manage all the resources in a multiple use context and meets the Congressional intent you cited.

23 { Regarding the AMP questions in your letter of September 30, it would be best if the individual plans could be discussed with you in person. The AMP is an interdependent plan and trying to explain parts of it outside the whole is counterproductive. Mr. Conn will be seeking a meeting with you in Reno in January to follow up on this letter and your discussion of November 24. I would like to have him discuss the three completed Caliente AMPs (Delamar, Mustang and Barclay-Lime Mountain) at that time.

Las Vegas District regularly reviews AMPs at the spring meeting of its Grazing Advisory Board. That is an excellent time for you to insure that your wild horse concerns are fully addressed.

At the present time, no geothermal or mining or other developments have been proposed for any of the herd management areas. However, there is the MX proposal. The EIS for that project will no doubt reveal certain impacts on wild horses when

it is made public. The Dry Lake Valley you refer to is one of those being proposed for MX development.

No bighorn sheep re-introductions were identified in any of the horse management areas.

I hope the foregoing responds to your questions. Mr. Conn and I appreciate your concerns for the proper management of wild horses in the Caliente Planning Unit. We both want to be aware of your concerns and, above all, keep open channels of communication between us.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ed. F. Spang".

For Edward F. Spang
State Director, Nevada

Ely Dist.

11-18-80

November 18, 1980

Mr. Edward F. Spang, State Director
Bureau of Land Management-Nevada
300 Booth Street
Post Office Box 12000
Reno, Nevada 89520

Dear Mr. Spang:

I protest the Caliente EIS and the land use planning process used to develop this proposed action. In March I attended a briefing for Caliente at the Sparks Nugget, where I addressed several of our concerns pertaining to the proposed action and the Wild Horse and Burro Act and current regulations. I was told to discuss it further after the meeting; wherein I showed Mr. Bingham the regulations in question and asked how the Caliente proposal related to these. He stated he was not aware of these regulations and had not seen them previously, but would inquire.

Later I expressed the same concerns to you, where in I was impressed that we would have further access into CRMP where our concerns would be addressed. Wild horses have now been reduced, with more to follow and still our concerns have not been recognized in any form!

Therefore we expect immediate and thorough response documenting policy, regulations, your position and the proposed action, and how it relates to the mandates of PL 92-195, NEPA, WLMBA and PRIA. Please show us how the Caliente EIS complies under the following: 1/

4700.0-5 (b) Wild free roaming horses and burros... that have used public lands all or part of their habitat..." 2/

4700.0-5 (d) "excess animals means wild free roaming horses or burros (1) which have been removed from an area by order authorized officer pursuant to applicable law or, (2) which must be removed from an area in order to preserve and maintain a thriving natural ecological balance and multiple use relationship in that area." 3/

Footnotes

- 1/ emphasis my own unless otherwise stated
- 2/ compelling force of PL 92-195 is preservation of horses and their habitat.
- 3/ "Excess" is not used singly, but in conjunction with entire sentence;

4700.0-5 (c) "malicious harassment"

4700.0-6 (c) "where found on public lands shall be considered comparably with other resource values in the development of resource management plans, under the Bureau's planning system, including allocation of appropriate forages of the available forage."

4730.1 (a) "current inventory"//...shall be maintained for each area where a herd exists..." *

4730.1 (b) "...in planning for management...including desirable numbers" 3/ 8/

4730.2 "management practices shall be at minimal feasible levels."

4730.3 "after determining optimum numbers reserve adequate forage...if necessary adjust livestock..." 8/

NEPA- "to preserve important, natural aspects of our National heritage, and maintain, wherever possible, an environment which supports diversity." 42 U.S.C. Id. § 4331 (b) (4).
NRDC v. Costle 341 F Supp. 256, 367 (E.D.N.C. 1972).

We are incensed at the Districts, seemingly with State Office approval, their broadened and constricted interpretations of PL 92-195, depending upon how it suits them and the local pressures. We insist on strict interpretation and strongly urge you to provide guidance to subsequent children.

7 In Caliente, the livestock permittee has access on a day to day basis by the resource specialists prior to land use planning and throughout the process. It is obvious that special interests had the upper hand in the development of the Caliente EIS. Those of us, who were limited by time and distance, addressed our concerns at the briefing; only to be totally ignored. While the Bureau concedes resolution through litigation, it appears that our ONLY recourse is limited to that! Whether we approve or disapprove of this avenue; we cannot stand by idly and watch the Bureau circumvent it's own regulations and planning process, but the Wild Horse and Burro Act as well.

Wild horses reduced by 33% and livestock by 6%; with no guarantees the funding will be available to implement the growing portion! We are wary of Bureau promises based on assumptions. Somewhere down the line MAYBE, grazing programs will be implemented, but in the mean-time, wild horse reduction will have paid the price for that amounts to over grazing by livestock.

Footnotes cont.

3/ the bottom line pointedly states "multiple use" and if horses are removed then it isn't multiple use.

A/ If the horses were removed without legal justification.

B/ No consultation was sought to address our concerns.

C/ Management is not synonymous with elimination.

D/ 6 BLR 20802 (D.D.G., Sept. 9, 1976).

E/ If zero was Congress' intent in determining optimum population, then the Bureau would not need regulations instructing them to provide forage for zero population. There was a question as to how many animals must be present to be considered in multiple use planning. The answer is one or more. Federal Registry Vol. 44, No 288, 250 (Dec. 28, 1978) Rules and Regulations.

Purpose and Objectives (1-2)

The FEIS states "the purpose of the proposed action is to manage the rangeland resources for 'stabilization' of the basic resource..."

*Websters Dictionary defines stabilize as: to hold steady the quality.

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2-44

"Wild horse movement may occur..."

"Wild horse movement probably occurs..."

"Possible movement patterns..."

"The higher elevations most likely..."

The above excerpts are taken from the Caliente EIS and it shows the District and the area to be exceedingly deficient in data necessary to "fairly and equitably" manage wild horses. What's more it shows they do not care. How can the Bureau eliminate wild horses, their habitat without knowing even the fundamental requirements of the animals? How can the Bureau design sophisticated grazing systems with fences, waterholes and vegetative manipulation without knowing how this will affect their social structure? What HAVE your wild horse specialists been doing since 1971, waiting for repeal of PL 92-195? Table 2-18 shows regardless of the lack of competition between wildlife, horses will be reduced, and Big Horn Sheep will loose AUMs. Loose them to who? Why?

Table 1-5, pg 1-5

- (B) (b) What assurances do we have that manpower and funds will be available for supervision? Who will monitor these proposed actions if funds are not forthcoming?
- (c) same as above
- (d) How does BIM intend to improve relationships with other interested parties, especially after the Caliente EIS?
- (A) When possible?
Please explain why commercial use will come before critical wildlife decisions?

Appendix E-3

After suitable acres are established, how did the team determine horse numbers?

Footnotes cont.

9/ Proposed regulations on grazing adjustment policy

General reasons 1-9

How would this reduce conflict between horses and livestock when (2-44) states that horses utilize the higher elevations in the summer?

Support requirements

- (1) We object strenuously to fences placed in HMA, in view of the lack of information about horses in the District.
- (13) Disturbed from what?
- (15) Co-operative agreements? What if they are not forthcoming?
- (19) Please explain "relocate" 10/

Vegetative Manipulation

What portions of HMA, if any, are to be manipulated and for what purpose? To increase forage for livestock, wildlife, or wild horses?

Table 1-9 notes

In other words the AMPs could even cost more depending upon the prescription at the time and the alleged monitoring could prove the AMPs unworkable, albeit the wild horse removal some years previous?

Table 1-10

Does the Bureau have a contingency plan in case funds are forfeited by new administration? Does the cost estimates include funding for monitoring, supervision, and the RMPD update to all interested parties?

Who will monitor if man-hours and funds are withheld?

In nearly all planning one of the most consistent statements made by the Bureau has been the "year-round use" by wild horses making it supposedly impossible to manage. How does the Bureau explain the current conditions of the range if nearly 50% of the allotments have been used year round by livestock.

According to Congress these animals if preserved in their natural habitats, "contribute to the diversity of life forms, and enrich the lives of the American people." 11/

This action is contrary to FLMPA, NEPA and the Wild Horse and Burro Act and what's more it is contrary to the Bureau's fiduciary responsibility.

Footnotes cont.

10/ We didn't believe this word used in PL 92-195 was in the Bureau's definition book.

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We believe these proposals to be the products of the Bureau's desire to increase the monetary return from the public lands rather than to serve all uses under the "multiple use" mandates of Congress. Furthermore we feel that the Bureau rather than confronting difficult issues has circumvented its own planning system by refusing to address concerns by those wishing to do so.

Your immediate attention is warranted and a timely response is expected.

Most sincerely,

Dawn X. Lappin (Mrs.)
Director

DYL/xl

cc: Board of Trustees/David Belding
Joanna Wald-NRDC

W H O A !

WILD HORSE ORGANIZED ASSISTANCE
INC.

A Foundation for the Welfare of
Wild Free-Roaming Horses and Burros

P. O. Box 555
Reno, Nevada 89504
Telephone 323-5908
Area Code 702

BOARD OF TRUSTEES
DAVID R. BELDING
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BELTON P. MOURAS
GERTRUDE BRONN, Honorary

In Memoriam

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

November 18, 1980

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I.d. § 4331
(b) (4)

NRDC V
GRANT

341 F Supp.
356, 367

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Page five
Caliente EIS

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cc: Joanna Wald-NRDC
Rose Strickland-Sierra Club
Craig Downer-Animal Protection Institute
Board of Trustees
Director BLM-Frank Gregg

Spang

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✓Possible movement patterns....✓

✓The higher elevations most likely✓

The above excerpts, taken from the Caliente EIS, shows the District and area to be exceedingly deficient in data necessary to "fairly and equitably" manage wild horses. What's more it shows they do not care. How can the Bureau eliminate wild horses, their habitat, without knowing the answers to the fundamental issues relating to their basic requirements? How can the Bureau design sophisticated grazing some allegedly for their benefit without knowing this? How can you place fences, water holes, without knowing? What HAVE your wild horse specialists been doing since 1971, waiting for repeal of PL 92-195? Table 2-18 shows regardless of competition of diet, wild horses will be reduced and Big Horn Sheep AUMs will be reduced? Why? Loose them to who?

Table 1-5 (pg 1-5)

- (3) (b) What assurances do we have that man power and funds will be available for supervision? 9/
(c) same as above?
(d) how does BLM intend to improve relationships with other interested parties, especially after the Caliente EIS?
- (4) "When possible?"
Please explain how commercial use can come before critical wildlife needs.

Appendix E-3

After suitable acres were determined, how did the team determine horse numbers?

Footnotes cont.

9/Proposed regulations on grazing adjustment policy

Page five
Caliente EIS

We believe these proposals to be the products of the Bureau's desire to increase the monetary return from the public lands rather than to serve all uses under the "multiple use" mandates of Congress.

Your immediate attention is warranted and timely response expected.

Most sincerely,

Dawn Y. Lappin (Mrs.)
Director

DYL/rl

cc: Joanna Wald-NRDC
Rose Strickland-Sierra Club
Craig Downer-Animal Protection Institute
Board of Trustees
Director BLM-Frank Gregg

General reasons 1-9

How would this reduce conflict between horses and livestock when (2-44) states horse utilize the higher elevations in summer?

Support requirements

- (17) We object strenuously to fences in HMA.
- (13) Disturbed from what?
- (15) Co-operative agreements? What is they are not forthcoming?
- (19) Please explain "relocated." 10/

Vegetative Manipulation

What portions of HMA, if any, are to be manipulated and for what purpose? To increase forage for livestock within HMA? For wildlife? Or for Wild horses?

Table 1-9 (notes)

In other words, the AMPs could even cost more depending upon the prescription at the time and the alleged monitoring could prove the AMPs unworkable, albeit the wild horse removal some years previous!

Table 1-10

Does the Bureau have a contingency plan incase funds are forfeited? Does the cost estimates include funding for monitoring, supervision and the RFPD update to ALL interested parties?

Who will monitor if funds are not obtained?

In nearly all planning one of the most consistent statements made by the Bureau has been the "year-round" use by wild horses making (supposedly) management nearly impossible; how does the Bureau explain the current conditions of the range if nearly all allotments have used the range year round? by livestock?

According to Congress these animals if preserved in their natural habitats, "contribute to the diversity of life forms....and enrich the lives of the American people." 11/

This action is contrary to FLMPA, NEPA, and the Wild Horse and Burro Act and whats more it is contrary to the ~~Bureau's~~ responsibility.

Footnotes cont.

10/ We didn't believe this word in Pl 92-195 was in the Bureau's definition book.

11/ S. 862, S1116, S1090 & S1119 Subcomm on Public Lands of the Senate Comm. on Interior and Insular Affairs, 92d Cong. 1st Sess., 69,122,128,138,169 and 183 (1971). If they are removed (eliminated) how can they contribute to the diversity of life forms?



Ely
United States Department of the Interior

3-13-79
IN REPLY REFER TO
4115.11
(N-057)

BUREAU OF LAND MANAGEMENT
Las Vegas District
P. O. Box 5400
Las Vegas, Nevada 89102

(702) 385-6627

MAR 13 1979

WHOA
P. O. Box 555
Reno, Nevada 89504

Dear Gentlemen:

We have completed the calculations of the 1976 range survey and the proposed management recommendations (MFP 2), including the forage allocation (distribution of suitable AUMs among livestock, wildlife, and wild horses and burros), for the Caliente Planning Unit.

Attached are several pages which include maps of the proposed Wild Horse Herd Areas and Wild Horse Removal Areas, as well as information on the maximum number in Herd Areas and the estimated removal numbers. These are the proposed recommendations and will be subject to public comment. The cumulative forage allocation will be used as the proposed action in the Caliente Grazing Environmental Statement. A final allocation will not be determined until completion of the statement.

A briefing is planned for the wild horse interest groups on Friday, March 23 at 1:00 PM in this office. We would like you to be present, if possible.

Beginning March 12, the draft management framework plan (MFP) for public land administration in southern Lincoln County will be available for public review and comment. Copies have been placed in libraries and other public facilities in Nevada and Utah. A list of locations is enclosed.

During this review and comment period, we will be working closely with the Lincoln County Commissioners and the Lincoln County Conservation District Board in hopes of assuring the recommendations made in the MFP are acceptable, workable, and cover the local needs.

Our comment period for this MFP ends April 30. To provide information about the plan to the general public, we will conduct openhouses on March 26, 27, and 28 in the conference room of the Las Vegas District Office, 4765 West Vegas Drive. Hours will be from 1 to 4 p.m. and from 7 to 9 p.m. Our objective in these early sessions is to answer your questions about the draft MFP.

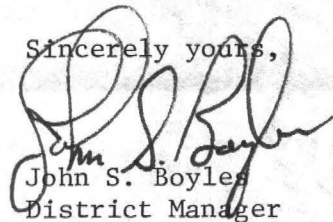


Save Energy and You Serve America!

We will be seeking your comments on the draft in a second series of openhouses. These will take place the week of April 9 in Caliente and in St. George, Utah. We'll have a letter out in early April giving the exact times, dates, and locations. If any of the above dates are inconvenient, we'll try to accomodate you at another time, by appointment.

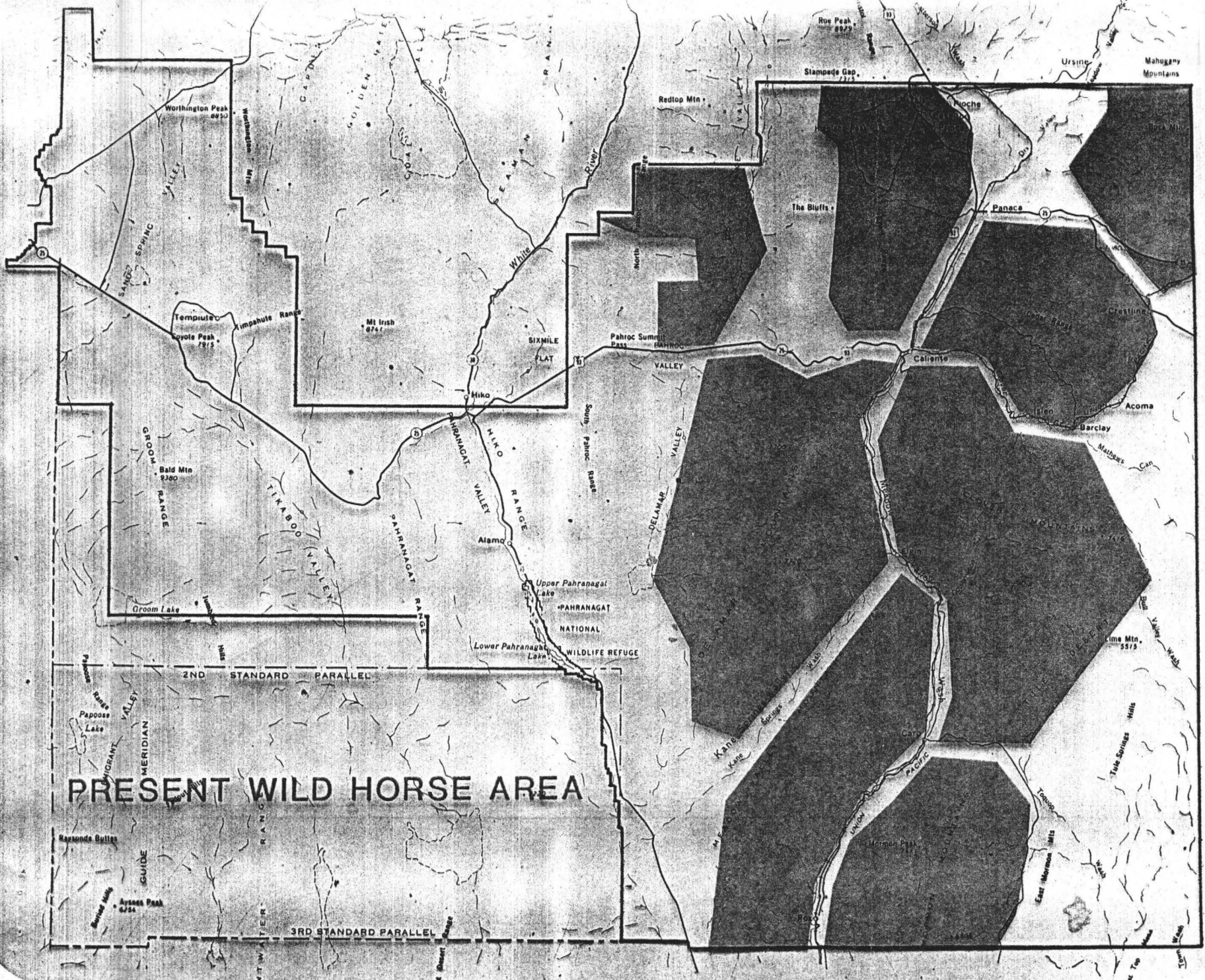
We hope that you or a representative of your group will be able to attend one of the above meetings. If you have any questions, please contact us.

Sincerely yours,

A handwritten signature in black ink, appearing to read "John S. Boyles". The signature is stylized and cursive, written over the typed name and title.

John S. Boyles
District Manager

Enclosures



PRESENT WILD HORSE AREA

2ND STANDARD PARALLEL

3RD STANDARD PARALLEL

MERIDIAN

RANGE

GUIDE

WATER

RANGE

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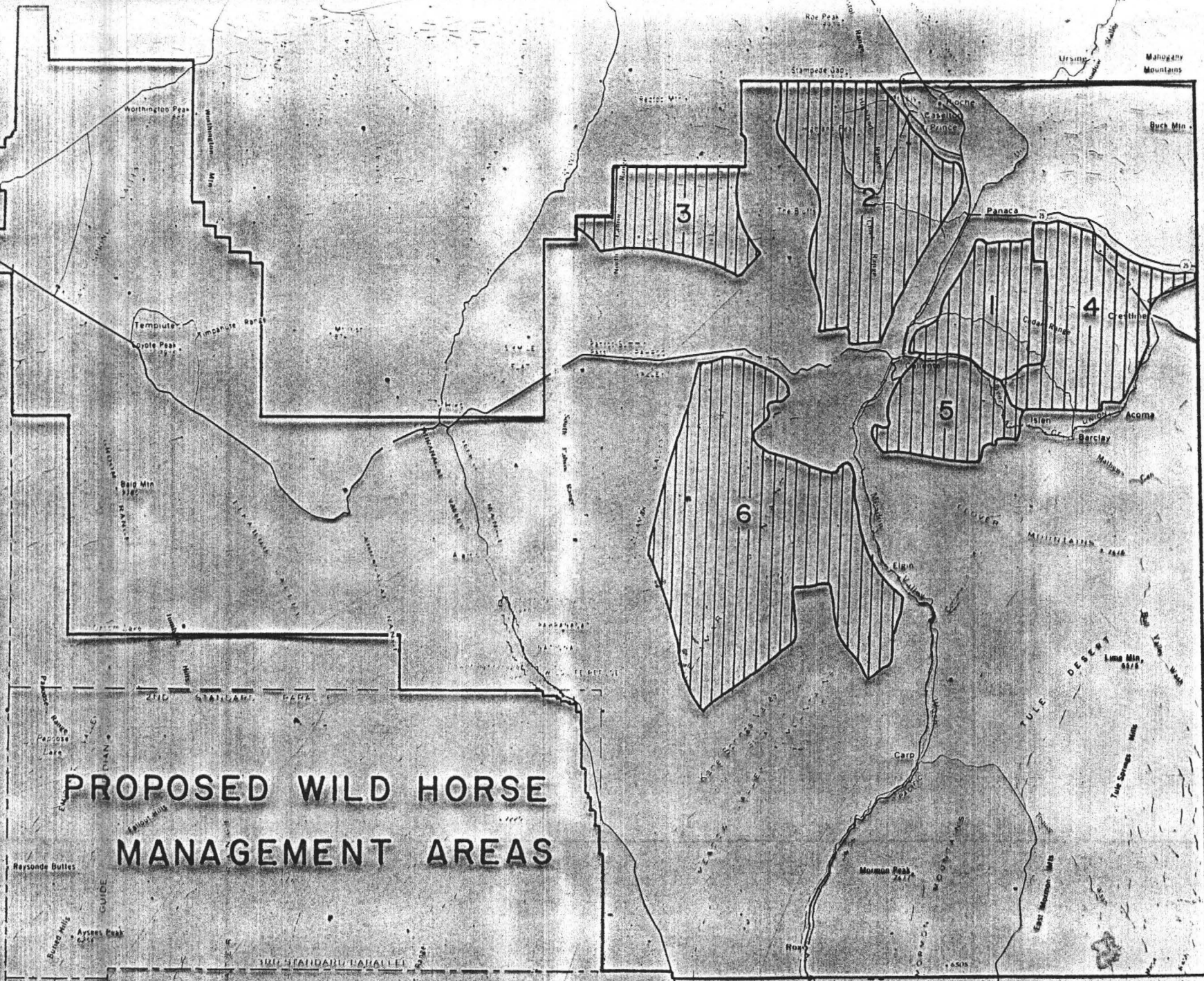
RANGE

GUIDE

WATER

Scale bar and other marginal markings.

Scale bar and other marginal markings.



**PROPOSED WILD HORSE
MANAGEMENT AREAS**

GUIDE

37° 30' N
110° 00' W

WILD HORSE MANAGEMENT LEVELS

<u>AREA NUMBER</u>	<u>ALLOCATED AUMs</u>	<u>NUMBER OF ANIMALS</u>
1	1,306	109
2	480	40
3	480	40
4	1,200	100
5	450	38
6	2,040	170
	<u>5,956</u>	<u>497</u>

TO BE REMOVED 555 (est)

% REDUCTION 52 %