

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: 4100 (NV-043)

OCT 3 1 1996

Rose Strickland Toiyabe Chapter of the Sierra Club P.O. Box 8096 Reno, Nevada 89507

Dear Ms. Strickland:

In response to your letter dated September 6, 1996 regarding actions associated with the 1996 emergency wild horse gathers, I offer the following response. The Ely District drought effort was initiated in June 1996. Field tours were initiated for the purposes of assessing drought conditions. Interested publics were provided an opportunity to attend these tours. Based upon the findings of the field observations which focused on forage condition and availability, water availability and animal condition, a determination was then made regarding the necessity to close allotments or portions of allotments to livestock, and to remove wild horses under drought emergency.

1. Timing of these actions:

Livestock removal has taken place on portions of various allotments since August 1996. All livestock removals were completed prior to initiating wild horses emergency gathers. Portions of allotments were closed and portions of herd management areas were gathered due to extremely limited forage production and availability and/or due to a lack of adequate water to sustain livestock and the populations of wild horses in the areas gathered. Removal of livestock and wild horses occurred before deterioration and degradation of rangeland health resulted.

2. Removal of livestock:

Livestock were removed voluntarily by the permittees and areas were closed to livestock use through agreement. Permittees also agreed to not turn out livestock in areas effected by drought conditions. Approximately 12,502 AUMs were placed in temporary suspension due to the drought. In addition, permittees agreed not to use another 4,890 AUMs which were previously authorized for grazing use. Livestock were removed from 9 allotments. The removal of livestock is temporary. Livestock will be allowed back into closed areas when vegetative growth begins and can support livestock grazing and when the key forage species show good vigor. This criteria for opening areas was identified in the closure agreements. Prior to authorizing further grazing use field inspections will be conducted to assess range suitability, forage suitability and condition and range readiness.

3. Removal of wild horses:

Wild horses were removed due to extremely limited forage production and availability and/or due to a lack of adequate water to sustain the populations in the areas gathered. As a result of drought assessments it was determined that wild horses and their habitat were adversely impacted. Due to the emergency nature of these conditions, emergency gathers were implemented immediately. Wild horse

populations will be allowed to increase by animals left in the herd management areas following the drought gathers. Populations will be allowed to increase to the appropriate management levels established through the allotment evaluation and multiple use decision process. Appropriate management levels have been established for all of the White River, Seaman, Wilson Creek and Dry Lake herd management areas. Wild horse were gathered to the lower limits of the appropriate management levels within these herd management areas therefore, we don't plan to turn wild horses back into these areas. Appropriate management levels have yet to be established for the Clover Mountains, Delamar, Meadow Valley Mountains, Highland Peak, Miller Flat and Little Mountain herd management areas. The evaluation and multiple use decision process will begin during 1997 for the Meadow Valley Mountains and Clover Mountains herd management areas. Once appropriate management levels are established for each herd management area, if the existing numbers are insufficient for a viable herd, wild horses will be released back into the areas.

4. Overgrazing problems:

Portions of allotments were closed to livestock grazing and wild horses were removed from portions of herd management areas to prevent deterioration and degradation of rangeland conditions associated with the 1996 drought in southern Nevada. Regarding your question about "overstocking", the allotment evaluation and decision process has been completed on some of the areas gathered. Evaluation and analysis did apply the crop yield index but did not apply weight averaging. Monitoring data gathered since implementation of the decision actions does not indicate that overstocking is a problem.

Aside from actions taken due to drought, the yield index is used to account for the affect of yearly climate variations on the calculation of appropriate stocking levels for all users. Since it is not feasible to adjust numbers of all grazing animals on a yearly basis to respond to annual fluctuations in precipitation, an average carrying capacity is determined based on a "normal" year. Ely District will continue to apply the yield index to evaluate if current grazing use is meeting multiple use objectives. Ely District does not apply "weight averaging" to evaluate active use or establish appropriate management levels for wild horse herd management areas. The evaluation and determination of stocking levels are based on those areas where utilization exceeds land use plan allowable utilization levels or those use levels set through a decision or activity plan. Ely District will continue to apply this procedure along with other monitoring procedures and data to evaluate grazing use.

If you have any further questions please feel free to call me.

Sincerely,

Hal Bybee

Assistant District Manager - Renewable

Resources