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Commission for the Preservation of Wild Horses Comments:

Livestock Decision Appeal Points

Under the Planned Actions Included in the Livestock Use agreement of 1988, "it is agreed that any increase or decrease in forage available will be proportionatelv divided among the range, wild horses and wildlife resources in this allotment." Monitoring data will be evaluated at the end of the initial three year period and again after the fifth.

Response 1: The forage available in the Buffalo Hills Allotment was proportionately divided among the livestock, wild horses, and wildlife resources. The Sonoma-Gerlach MFP III Decision set the number of wild horses in the Buffalo Hills, Granite, and Calico Herd Management Areas as the number of wild horses that existed on July 1, 1982 as a starting point for monitoring. The 1988 Buffalo Hills Allotment Evaluation continued with the wild horse numbers from the Land Use Plan. The Interior Board of Land Appeals decision #88-591 of June 7, 1989 stated that the numbers established in the Land Use Plan could not be justified as the Appropriate Management Levels because they were established at a particular point in time for administrative reasons. The optimum number of wild horses was to be set through monitoring data to result in a thriving natural ecological balance and avoid deterioration of the range.

The 1992 Buffalo Hills Allotment Evaluation used monitoring data to establish a stocking rate for livestock and wild horses in each pasture. The ratios established in the Land Use Plan were applied to the total carrying capacity of each pasture, which resulted in wild horse numbers higher than those stated in the Land Use Plan for two of the four pastures. These wild horse numbers are valid since they were established with monitoring data. Carrying capacity calculations also supported an increase in livestock numbers in three pastures, but because wild horse numbers are still above Appropriate Management Levels and resource objectives were not met, livestock numbers were not increased. Wildlife numbers remained consistant with the Land Use Plan.

The 1988 Buffalo Hills Allotment Evaluation specified that "Evaluation schedules of monitoring data will be based on Sonoma-Gerlach Resource Area Priorities." Monitoring data was not evaluated at the end of three years due to other Resource Area priorities. The fifth year produced the 1992 Buffalo Hills Re-evaluation.

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The Final Decision adjusts the land use plans of when short term objectives will be achieved and extends the allotment evaluation and decision period.

Response 2: BLM Manual 4400, schedules for analysis, interpretation, and evaluation are based on grazing cycle length, allotment priorities developed through categorization, and funding levels. The District chose two grazing cycles to document the success of the grazing system now that total forage demand will be more in line with the potential grazing capacities. BLM will not wait until 1999 to discover there is a problem. As stated on page 52 of the re-evaluation, an annual narrative will be written documenting the success of management actions and the grazing system toward meeting resource objectives. If the available information documents management actions are not achieving or meeting resource needs, BLM, along with affected parties, will devise a strategy to deal with the shortcomings. The entire process is to make initial calculations, implement, monitor, adjust, moniter, adjust etc.

The Final Decision prescribes livestock use in the Dolly Varden pasture up to October 15th for two consecutive years.

Response 3: In developing the grazing system for the Dolly Varden Pasture, the utilization of bitterbrush was evaluated. Two years of back to back use, after seed ripe of grasses and bitterbrush, followed by two years of rest from livestock use has shown to be beneficial to all species, including bitterbrush. By our analysis, conservative stocking rates of livestock (approximately 37 acres/AUM), bringing wild horse numbers to the AML, and movement of livestock as utilization levels were being reached will minimize the potential adverse affects to bitterbrush by cattle. These conclusions were supported by the following information.

1. Studies on the Sheldon Wildlife Refuge (Hansen, 1982) and fecal analysis on the Surprise Resource Area, Cedarville Distict of the BLM in 1976-77 show that bitterbrush only made up 1-7% of cattle's diet during the grazing period from July to September. The Surprise R.A. data came from just west of the Dolly Varden Pasture on the west slope of Fox Mountain.

2. Scholten (1982), McConnell and Smith (1977), Mueggler and Stewart (1980) did not find that light to moderate use by cattle during late summer and fall adversely affected bitterbrush.

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3. Woodis (1989) on studies of cattle and deer use of bitterbrush in deferred late season grazing of the Sheldon Wildlife Refuge showed that cattle grazing could have a positive effect on bitterbrush production by stimulating decadent stands through hedging.

4. Livestock use in the Dolly Varden Pasture, with this season-of-use during this evaluation period, has not been shown to have a detrimental impact on bitterbrush. This is based on monitoring studies at the Mahogany Troughs key area.

Wild Horse Decision Appeal Points

Appendix 8, Stocking Level Calculations and Procedures, do not present actual use data and equations to support estimated carrying capacities for wild horses. Appendix 8 shows the use of weighted averaging is applied to carrying capacity estimates.

Response 4: Actual Use data used to determine the Potential Stocking Levels were presented on pages 8-13 of the Re-evaluation. The Use Pattern Mapping Data was presented in Appendix 6 of the Re-evaluation. The actual use data and the Use Pattern Mapping data support the potential carrying capacity shown in the re-evaluation. Ratios from the Sonoma-Gerlach MFP III were applied to the potential carrying capacity to determine the Appropriate Management Levels for wild horses and livestock numbers for each pasture.

Livestock active preference, wild horses and burro levels, and wildlife initial levels were to be monitored and adjusted if necessary to meet carrying capacities and the thriving ecological balance for wild horses.

Response 5: Livestock and wild horse levels have been monitored by BLM for this evaluation. Wildlife populations were monitored by the Nevada Department of Wildlife. The 1992 Buffalo Hills Allotment Evaluation analyzed monitoring data collected for livestock, wild horses, and wildlife. The carrying capacity was established for each pasture in the allotment and adjustments made as necessary.

Livestock use levels were adjusted in the Calico and Dolly Varden Pastures as a result of monitoring, but they were not given their full allocation, again as a result of wild horse numbers and objectives not being met. Appropriate Management Levels were also set for wild horses in this evaluation which resulted in an increase

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from the Land Use Plan starting point levels. The wild horse gathers conducted during January-March 1993 did get horse levels to AML in the Buffalo Hills pasture, but the rest remain above AML due to BLM's selective removal policy and the tremendous horse numbers that previously occurred. Wildlife numbers remained consistant with the Land Use Plan levels. The numbers established in this evaluation should result in a Thriving Natural Ecological Balance for the Buffalo Hills Allotment.

Wildlife Decision Appeal Points

Final Decision does not allocate forage for wildlife.

Response 6: Forage has been reserved for wildlife based on reasonable numbers provided by NDOW and established in the Sonoma-Gerlach MFP III Decision. NDOW has not asked to redo the reasonable numbers for wildlife. The formulas we use for forage allocation only consider use by horses and domestic livestock, so they can't be used to allocate forage to wildlife. Fecal analysis on the west slope of Fox Mountain on the Surprise R.A. have shown very little dietary overlap between cattle and mule deer during the time of year that the Dolly Varden Pasture will be grazed. Two new positions, a wildlife/fisheries biologist and a range conservationist have been added to the resource area staff since the last evaluation of this allotment to increase the monitoring of vegetative condition and utilization in this allotment. If competition for forage becomes apparent through this monitoring, appropriate management action will take place to reduce the competition and provide forage for wildlife.

Some confusion may have resulted due to a BLM error in which we substituted the term "Desired Stocking Level" for "Potential Stocking Level". Different methods are used to calculate each one. Potential Stocking Level was the method applied and should have been the term used in the document.