

W H O A

WILD HORSE ORGANIZED ASSISTANCE
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a note from

Dawn Y. Lappin

January 13, 1994

Mr. Scott Billings
Paradise-Denio Resource Area
Bureau of Land Management
705 East 4th Street
Winnemucca, Nevada 89445

Subject: Jackson Mountain Evaluation

Dear Mr. Billings:

Thank you for the opportunity to review and comment on the draft Jackson Mountain Evaluation and technical recommendations.

Page 43b If the monitoring is read only at the end of the growing season the objective will not be met. Cattle will remain on the riparian area until they are physically moved. Once the utilization level is attained the cattle should be moved and not return. Studies have shown that physical damage to stream banks can occur before utilization level is met.

Page 43c Key species on wetland riparian habitat would be better managed at a 40 to 50% utilization level not at stubble height.

Page 45b It is unclear what you are proposing for the HMA's under B. HMA's can only be changed by amending MFP's, LUP's, etc.

Page 45c Your statement that "management related to wild horses is only included which can be implemented in concurrence with any of the three alternatives," leaves the reader to believe that horses can't be managed without livestock on the allotment. This a misleading statement.

Page 46 & 47 You do not address the situation of horses that are reported to be migrating from the Black Rock Range to the

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Jacksons. This should be addressed or studied to see if it is true.

Page 48 Alternative 1 - You are using the utilization levels 70% that were found on riparian areas which is predominantly cattle overuse. You then adjust horse numbers using these figures. You then state on page 50 that cattle indeed congregate on the riparian areas during hot seasons and this "may result in continued failure to meet riparian objectives." and that further reductions may be needed. You are making horses pay the bill for the overgrazing caused by total mismanagement of the livestock. When horses cause the problem, reduce horses, when cattle cause the problem reduce cattle!

If there is not change in the permittees cattle operation this alternative is not acceptable.

Page 51 Alternative 2 - You are allowing cattle grazing in riparian areas during the hot season and are only proposing drift fences to keep them off. This will not work. You do not specify any rotation system or periods of rest. Without some type of rest rotation system you are simply delaying the total removal of cattle from this allotment if a true management system is not developed.

Page 53 It is arbitrary and capricious to use one method for determining stocking rate for horses and another for cattle. If the permittee has demonstrated such willingness to reduce the stocking level why are the riparian areas in such deplorable condition? If you're basing horse stocking rates on a drought year cattle should be stocked likewise. Again you're reducing horse numbers based on the lack of management of the livestock operator.

We believe that you are manipulating data to achieve the best objectives for the livestock. Why then would you choose to use the best year for cattle, 1988, and the worst year for horses, 1992. This is a blatant example of arbitrarily (intentionally), using opposing data to place further blame on the horses. To achieve consistency in the final we request that you use all years...1988-89-90-91 and 1992, for both livestock and wild horses. We request that you portray all the data and computations for those years for both species and not just selectively use one year for livestock and four drought years later for horses.

Page 55 & 56 You are only reducing the use by cattle on the riparian areas by 25 cattle. It looks like the major benefit of this alternative is that the BLM will not have to confront the permittee with the fact that cattle numbers have to be reduced.

Page 56 Alternative 3 You are again proposing to reduce wild horses and allow cattle grazing to continue as it has, for the past 50 years, until allotment objectives are met. It has become completely apparent in this document that the Bureau is totally

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intimidated by this permittee and is not willing to initiate the changes that are necessary to meet the vegetative needs of the allotment. Your statement of allowing the permittee to harvest the maximum amount of AUM's is the key as to where Bureau priorities lie.

WHOA has long been involved with the Bureau in the Land Use Planning process trying to achieve optimum habitat conditions for all users in Nevada. We hope that you will review and use our comments and suggestions where appropriate. If you have any questions, please feel free to call.

Sincerely,

Dawn Y. Lappin
DAWN Y. LAPPIN
Director

*Reviewed 1/14/94
Lappin*