

BOB MILLER  
Governor

STATE OF NEVADA



**COMMISSION FOR THE  
PRESERVATION OF WILD HORSES**

Stewart Facility  
Capitol Complex  
Carson City, Nevada 89710  
(702) 687-5589

6-14-93  
CATHERINE BARCOMB  
Executive Director

**COMMISSIONERS**

Dan Keiserman,  
Las Vegas, Nevada

Michael Kirk, D.V.M., *Chairman*  
Reno, Nevada

Paula S. Askew  
Carson City, Nevada

Steven Fulstone  
Smith Valley, Nevada

Dawn Lappin  
Reno, Nevada

June 14, 1993

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

Dear Scott:

The Nevada Commission for the Preservation of Wild Horse appreciates your consultation concerning the Jackson Mountains Herd Area. It is unfortunate that I cannot attend the Jackson Mountain Allotment Evaluation Meeting on June 28, 1993. Please accept the following comments and concerns for the Draft Jackson Mountains Allotment Evaluation.

**Land Use Planning Issue:**

To our knowledge, the Jackson Mountains Wild Horse Herd and present livestock operation have no approved activity plans. Lack of proper and coordinated activity plans lends the pending multiple use decision as the only process to establish a thriving ecological balance by adjusting livestock and wild horses to within the range carrying capacity.

The Paradise-Denio land use plan was completed in 1982 and MFP III Decisions initiated monitoring for decisions to be issued within five years. In spite of over ten years, the Jackson Mountains Allotment has never been fully evaluated and adjustments never implement to protect declining range conditions. A decision in 1993 to implement multiple use and sustained yield management of the area is over five years delinquent.

An appropriate management level to the wild horse herd must be established with a livestock carrying capacity to meet all allotment objectives. These decisions must be based upon resource monitoring data.



Mr. Scott Billings  
June 14, 1993  
Page 2

**Allotment Objectives:**

The objectives set for this allotment in 1988 were adjusted without an approved activity plan. As specifically addressed in the allotment objectives found in the 1988 Jackson Mountain/Bottle Creek Allotment Evaluation, any adjust requires procedures and a manager's decision.

**Wild Horses:**

On page 5, the document briefly explains wild horse management restrains for the allotment. It states a conclusion that the appropriate management level "may be more or less than 160 horses". This section make no reference to adjustment of other ungulates. It appears to be bias prior to analysis of any data.

On page 15, the document discusses surveys and data for this herd. We find that survey technique and timing are random data over the past 13 years of monitoring. Recruitment rates range from zero to 29 percent based upon summer surveys. These survey data were not analyzed in relationship to the five gathers conducted since 1988. It would be important that population estimates and recruitment rates be fully explained to support an appropriate management level in a multiple use decision.

On pages 30 through 35, we concur with the conclusions that wild horses do not significantly contribute to exceeding the proper utilization limits on stream bank riparian habitats. As found in other evaluations, wild horse do have a significant impact to wetland meadow riparian habitats. We agree with the District that none of the riparian utilization limits or allowable use levels for key species have been met since monitoring was established in 1982.

**Technical Recommendations:**

We encourage the District to implement stocking rates with seasons of use for livestock and appropriate management levels for wild horses that will meet all allotment objectives found in the 1988 Jackson Mountain Allotment Evaluation. Unless riparian habitats are managed in good condition, we fail to find how a multiple use decision can achieve a thriving ecological balance for the Jackson Mountains Wild Horse Herd.

Sincerely,



CATHERINE BARCOMB  
Director