



STATE OF NEVADA
DEPARTMENT OF WILDLIFE

1100 Valley Road
P.O. Box 10678
Reno, Nevada 89520-0022
(702) 688-1500
Fax (702) 688-1595

BOB MILLER
Governor

WILLIAM A. MOLINI
Director

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January 27, 1992

Mr. Burton J. Stanley, Esq.
Office of the Regional Solicitor
U.S. Department of the Interior
2800 Cottage Way, Room E-2710
Sacramento, CA 95825-1890

RE: Paiute Meadows Allotment Decision Appeals - Wild Horse Impacts

Dear Mr. Stanley,

The Nevada Department of Wildlife has met with the Bureau of Land Management and affected interests concerning our appeal of the Paiute Meadows Allotment Full Force and Effect Multiple Use Decision, dated November 22, 1991. We wish to offer the Bureau of Land Management additional data and our professional judgement concerning necessary management actions to protect, maintain and enhance Nevada's fish and wildlife habitat.

The Paradise-Denio Resource Area chose to prepare an allotment evaluation and issue a manager's decision to implement the land use plan and resolve ongoing resource conflicts on the Paiute Meadows Allotment. As a step of this decision making process, the allotment evaluation set specific multiple use objectives to maintain and restore crucial fish and wildlife habitats. Short-term objectives limiting ungulate grazing use to 30% on streambank riparian and 50% on wetland riparian vegetation are essential elements in this decision making process. In our opinion these utilization limitations are necessary criteria for establishing the carrying capacities of the allotment pastures.

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Use Pattern Mapping Data collected by the Bureau during 1988, 1989 and 1990 on riparian habitats coincide with the data and observations of the Nevada Department of Wildlife. As a cooperative and interagency task, the Department conducted General Aquatic Wildlife System Stream Surveys during the summer of 1989. Ungulate use and occurrence was noted by our biologist on Battle Creek July 26, 1989 when he observed 61 horses on tributary streams to the South Fork of Battle Creek. Though ungulate grazing use on streambank riparian vegetation was measured to be slight on the South Fork of Battle Creek, the author photographed overuse on small riparian areas associated with the tributaries to Battle Creek.

Annual big game surveys conducted by the Department on the Black Rock Range have resulted in observations of wild horses. Our observations concur with the Bureau's assessment that a majority of horses inhabit the southern portions of the allotment. Photographs taken of key riparian sites during the spring of 1990 by the Department confirm much of the use pattern mapping data of the Bureau. In general, wild horse use exceeded 50% utilization on wetland riparian habitats in the southern portions of this allotment.

Degradation of wetland riparian habitat has a direct adverse impact upon wildlife diversity and abundance. For example, wetland riparian habitats are critical to sage grouse, antelope, mule deer and nongame wildlife. Meadows provide the forbs, grasses, insect and cover necessary for successful brood and fawn survival. Season long grazing will damage the viability of important forbs and encourage the invasion of less palatable invader type species. Heavy or severe grazing results in complete loss of residual vegetation. Stubble or standing plants are essential to wildlife for cover, thermal protection, and nesting and such vegetative ground cover prevents soil erosion. Loss of vegetative diversity and abundance has a direct relationship to wildlife composition and numbers.

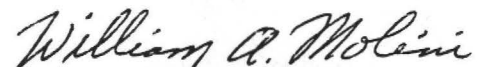
Degraded habitat and excessive numbers of wild horses causes severe competition for water, cover and forage. Wildlife biologists have observed wild horses excluding antelope from water sources. Since these waters are associated with riparian habitat essential for fawn survival, antelope does and fawns are being displaced to less productive upland sites. Continued overuse for preferred forbs too early in the spring will eventually reduce forb frequency and availability to lactating does supporting fawns. Winter range competition for perennial grass, winterfat and sagebrush at lower elevations affect big game survival. Recent mule deer population data shows the poorest rate of fawn recruitment ever observed in Management Area 3 over the past five years.

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The Department of Wildlife concurs with the use pattern mapping data collected by the Bureau of Land Management. We feel that it is incumbent upon the Bureau to authorize use that will not exceed the lands carrying capacity. Criteria set forth in the allotment evaluation's short-term objectives and monitoring data analysis provides the process and rationale for the manager's decision. Since use pattern mapping data distinguishes livestock and wild horse use on key wildlife habitats, we can support a significant reduction of wild horses as a part of the relief necessary to stop resource damage and, at the same time, establish the allotment's carrying capacity.

We hope this information will assist in implementing actions necessary to curtail resource damage on the Paiute Meadows Allotment

Sincerely,



William A. Molini
Director

REL:rl/el

cc: Region I
Wayne Howle