

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
Winnemucca District Office
705 East Fourth Street
Winnemucca, Nevada 89445

In reply refer to:

JAN 13 1994

4700 (NV-026.8)

Memorandum

To: State Director, Nevada

From: District Manager, Winnemucca

Subject: Rationale for Placing the Winter 1994 Wild Horse Removal Plan in Full Force and Effect

If horses are not removed immediately the following impacts, as identified in the Buffalo Hills Allotment, Leadville Allotment, Paiute Meadows and Soldier Meadows Allotment re-evaluation and Multiple Use Decision will occur:

- The Black Rock Range East & West, Calico Mountains, and Warm Springs Canyon HMA's are located north of Gerlach, Nevada within steep rocky terrain that has very limited access. A removal in these HMA's in July/August 1986 resulted in many of the captured horses having foot injuries even though they were brought very slowly into trap sites. Based on past gathering experience in these HMA's, the District has found that winter or late fall removals results in the least amount of stress and injuries to wild horses. During the winter months wild horses are located closer to roads and potential trap sites, and foals are physically more mature.
- The existing wildhorse population is 100% above AML in the Calico Mountains HMA. The existing wild horse population in the combined Black Rock Range East & West HMA's is 380% above AML, and 150% above AML in the Warm Springs Canyon HMA. During the 1992/1993 winter the area received normal winter precipitation after six years of drought that resulted in a loss of wild horses of approximately 43% from the Calico Mountains HMA, 19% from the Black Rock Range -West HMA, 37% from the Black Rock Range - East HMA, and 46% from the Warm Spring Canyon HMA. If normal to above normal winter precipitation is received, there is a strong potential for an above normal death loss of wild horses from these areas. If below normal precipitation (current situation) is received, it may result in decreased forage production which could lead to decreased body conditions (from good to fair to poor) of horses within the HMA's. The effect of decreased forage

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production and loss of body condition would be greatest on mares with foal.

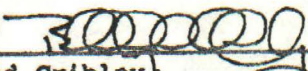
- The combined carrying capacity for the Leadville Allotment is exceeded by the existing population of wild horses. The combined carrying capacity for the Soldier Meadows Allotment is almost exceeded by the existing population of wild horses. If horses are not removed this winter, progression toward the attainment of a Thriving Natural Ecological Balance will be delayed.
- The Nevada Wild Horse and Burro Gathering Contract # 1422-N651-C2-3806 expires June 30, 1994. It is not possible to accurately estimate increased cost to gather if the removal is not conducted this winter, however, if the increase in contract prices are similar to last year, it is estimated that costs may increase by \$17,600.00. The estimated cost increase is based on the difference between Schedule A & B of the existing contract and only considers the capture cost.
- Implementation of the livestock management actions alone would not allow attainment of resource objectives in the allotments. Livestock grazing management can not be effectively implemented (change in season of use, pasture level stocking, grazing system) within the allotments until the wild horse population is at, or below, AML.
- If wildhorse populations are not reduced to or near AML, livestock numbers will be directly or indirectly reduced in the affected allotments in the following ways:
 - The number of livestock authorized to graze the Paiute Meadows Allotment would temporarily be adjusted downward until wild horses numbers reach appropriate management level.
 - Livestock grazing would not be authorized in the Calico pasture of the Buffalo Hills Allotment.
 - Livestock in the Leadville and Soldier Meadows Allotments would be moved within pasture, moved to another pasture, or removed from the allotment once established utilization levels are reached. If livestock are removed early from an allotment this would result in the livestock permittee not being allowed to fully utilize their authorized grazing use.
- We will not be able to implement the Reasonable and Prudent Measures along with the Terms and Conditions outlined in the Fish and Wildlife Service's Biological Opinion on the proposed Soldier Meadows Allotment Livestock Grazing and Wild Horse and Burro Management Decision dated 12/2/93. This Biological Opinion is a response from formal consultation with the Fish and Wildlife Service pursuant to Section 7 of the Endangered Species Act of 1973, as amended. At issue are the potential adverse effects to

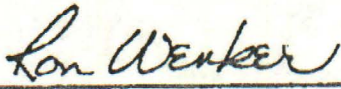
Lahontan Cutthroat Trout and Desert Dace habitats within the Soldier Meadows Allotment by wildhorses. This alternative is not in compliance with the terms and conditions outlined by the U.S. Fish and Wildlife Service Biological Opinion for the Soldier Meadows Allotment, pursuant to section 7 of the Endangered Species Act of 1973. The Biological Opinion states, "in order to be exempt from the prohibitions of section 9 of the ACT, the Bureau must comply with these terms:

- a wild horse and burro gather shall occur during the winter of 1993-1994 and wild horse and burro AML's shall be achieved over 6 years using two gather cycles.

There have been no written comments received on the Draft Winter 1994 Removal Plan.

Based on the above rationale, I recommend that the Winter 1994 Removal Plan be issued Full Force and Effect.

 Date: 1-13-94
 Bud Cribley
 Area Manager, Sonoma-Gerlach Resource Area

 Date: 1/13/94
 Ron Wenker
 District Manager, Winnemucca

I concur:  Date: 1-14-94
 Acting Billy Templeton
 State Director, Nevada

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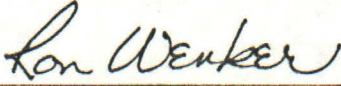
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Billy Templeton
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