



United States Department of the Interior

BUREAU OF LAND MANAGEMENT  
Winnemucca Field Office  
5100 East Winnemucca Boulevard  
Winnemucca, Nevada 89445  
702-623-1500

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In Reply Refer To:  
(NV-022.24)  
4160

APR - 5 2000

CERTIFIED MAIL NO. Z229099787  
RETURN RECEIPT REQUESTED

Ms. Cathy Barcomb  
Nevada Commission for the  
Preservation of Wild Horses  
123 West Nye Lane, Suite 248  
Carson City, NV 89706-0818

Dear Ms. Barcomb:

Enclosed is the Final Multiple Use Decision for the Pole Canyon Allotment.

If you have any questions, feel free to contact Tom Seley at (775) 623-1500.

Sincerely yours,

Colin P. Christensen  
Assistant Field Manager  
Renewable Resources

Enclosure



## United States Department of the Interior

BUREAU OF LAND MANAGEMENT  
Winnemucca Field Office  
5100 East Winnemucca Boulevard  
Winnemucca, Nevada 89445  
775-623-1500

In Reply Refer To:  
NV-022.42

4160  
**APR - 5 2000**

CERTIFIED MAIL NO. Z229099779  
RETURN RECEIPT REQUESTED

John and Vella Torvick  
455 N. Harmon Road  
Fallon, NV 89406

### **FINAL MULTIPLE USE DECISION POLE CANYON ALLOTMENT**

Dear Mr. and Mrs. Torvick:

The Record of Decision for the Sonoma-Gerlach Grazing Environmental Impact Statement was issued on September 18, 1981. The Sonoma-Gerlach Management Framework Plan III was issued on July 9, 1982. These documents guide management of public lands within the Pole Canyon Allotment. Monitoring data has been collected on this allotment and in accordance with Bureau policy and regulations, this data has been evaluated in order to determine progress in meeting management objectives and standards for rangeland health, and to determine if management adjustments may be necessary to meet the management objectives and standards for rangeland health.

The Pole Canyon Allotment Evaluation dated February 17, 2000, evaluated data from 1988 - 1997. On February 22, 2000, the Final Pole Canyon Allotment Evaluation and Proposed Multiple Use Decision were issued. No Protests were recieved.

## MULTIPLE USE OBJECTIVES/STANDARDS FOR RANGELAND HEALTH

The following are the multiple use management objectives and standards for rangeland health under which grazing on the Pole Canyon Allotment will be monitored and evaluated:

### A. Short Term

1. Utilization of key species (SIHY, STTH2, AGSP) in upland habitats shall not exceed 50% of current years growth.
2. Utilization of key plant species (JUNCUS) in riparian habitat shall not exceed 50%.

### B. Long Term

#### 1. Desired Plant Community

The long term Desired Plant Community objectives percentages may need to be adjusted slightly once key areas are established. The amount of change would remain the same however.

#### a. Objective 1

##### 1) Short Term

On Ecological Site 023XY039 (Loamy Slope 10-14") within SWA F200, initiate an upward trend by increasing the cover of key grasses and forbs.

Quantify and identify key species for this objective when the initial trend study is established.

2) **Long Term**

Manage for the following percent composition by weight:

Percent Composition By Weight			
<b>Lifeform</b>	<b>Existing</b>	<b>Desired</b>	<b>Potential</b>
Perennial Grasses	10%	20%	65%
Forbs	6%	6%	10%
Shrubs	79%	72%	25%
Annual Grasses	5%	2%	0%

Increase perennial grasses (SIHY, STTH2, and AGSP) from 10 to 20% composition by weight. Maintain and improve SYMPH at 3%.

This objective should be achieved by the year 2024.

b. **Objective 2**

1) **Short Term**

On Ecological Site 024XY002 (Loamy 5-8") within SWA F201, maintain an upward trend of key grasses and forbs.

Quantify and identify the key species for this objective when the initial trend study is established.

2) **Long Term**

Manage for the following percent composition by weight:

Percent Composition By Weight			
Lifeform	Existing	Desired	Potential
Perennial Grasses	2%	2%	25%
Forbs	1%	1%	5%
Shrubs	93%	93%	70%
Annual Grasses	2%	2%	0%
Annual Forbs	1%	1%	0%

Maintain ARSP5 at 29% of the composition by weight.

This objective should be achieved by the year 2024.

2. Manage, maintain, and improve public rangeland condition to provide forage on a sustained yield basis, with an initial forage demand for big game of 15 AUMs for mule deer, 7 AUMs for pronghorn, and 37 AUMs for bighorn sheep, by:
  - a. Improving or maintaining the following mule deer habitat in the Fox Range DY-1 to at least good condition.
  - b. Improving and maintaining the Fox Range AY-1 pronghorn habitat condition to at least good condition.
  - c. Improving and maintaining the Fox Range BY-3 bighorn sheep habitat condition to at least good condition.

3. Protect and maintain suitable Sage Grouse Habitat within the potential of the ecological site.

The following parameters have been found to constitute optimum (good) conditions for sage grouse use:

a. Strutting Habitat

Low sagebrush or brush free areas for strutting and nearby areas of sagebrush having 20-50% canopy cover for loafing.

b. Nesting Habitat

- 1) Sagebrush between 7 and 31 inches in height (optimum = 16 inches)
- 2) Sagebrush canopy cover of 15-30% (optimum = 27%)
- 3) 25-35% basal ground cover
- 4) Average understory height of 6-7 inches (grasses)

c. Brood Rearing

Early Season

- 1) Sagebrush canopy cover of 10-21% (optimum = 14%)

Late Season

- 1) Meadow areas that are in functioning condition
- 2) Residual meadow vegetation of no less than 3-6 inches in height

d. Winter Habitat

Greater than 20% sagebrush canopy cover

C. Standards and Guidelines for the Sierra-Front-Northwest Great Basin Resource Advisory Council:

1. Soils: Soil processes will be appropriate to soil type, climate and land form. As indicated by:
  - \* Surface litter is appropriate to the potential of the site;
  - \* Soil crusting formations, in shrub interspaces, and soil compaction are minimal or not in evidence, allowing for appropriate infiltration of water;
  - \* Hydrologic cycle, nutrient cycle and energy flow are adequate for the vegetative communities;
  - \* Plant communities are diverse and vigorous, and there is evidence of recruitment; and
  - \* Basal and canopy cover (vegetative) is appropriate for site potential.
2. Riparian/Wetlands: Riparian/wetland systems are in properly functioning condition. As indicated by:
  - \* Sinuosity, width/depth ratio and gradient are adequate to dissipate streamflow without excessive erosion or deposition:
  - \* Riparian vegetation is adequate to dissipate high flow energy and protect banks from excessive erosion: and
  - \* Plant species diversity is appropriate to riparian-wetland systems.
3. Water Quality: Water quality criteria in Nevada or California State Law shall be achieved or maintained. As indicated by:
  - \* Chemical constituents do not exceed the water quality standards;
  - \* Physical constituents do not exceed the water quality standards;
  - \* Biological constituents do not exceed the water quality standards; and

- \* The water quality of all water bodies, including ground water located on or influenced by BLM lands will meet or exceed the applicable Nevada or California water quality standards. Water quality Standards for surface and ground waters include the designated beneficial uses, numeric criteria, narrative criteria, and antidegradation requirements set forth under State law, and as found in Section 303(c) of the Clean Water Act.
4. Plant and Animal Habitat: Populations and communities of native plant species and habitats for native animal species are healthy, productive and diverse. As indicated by:
- \* Good representation of life forms and numbers of species;
  - \* Good diversity of height, size, and distribution of plants;
  - \* Number of wood stalks, seed stalks, and seed production adequate for stand maintenance; and
  - \* Vegetative mosaic, vegetative corridors for wildlife, and minimal habitat fragmentation.
5. Special Status Species Habitat: Habitat conditions meet the life cycle requirements of special status species. As indicated by:
- \* Habitat areas are large enough to support viable populations of special status species;
  - \* Special status plant and animal numbers and ages appear to ensure stable populations;
  - \* Good diversity of height, size and distribution of plants;
  - \* Number of wood stalks, seed stalks, and seed production adequate for stand maintenance; and
  - \* Vegetative mosaic, vegetative corridors for wildlife, and minimal habitat fragmentation.



## LIVESTOCK DECISION

Based upon the evaluation of monitoring data for the Pole Canyon Allotment, consultation with the permittee and other interested publics and recommendations from my staff, it is my final decision for livestock to change the management:

### **FROM: (DESCRIPTION OF EXISTING USE)**

1. Grazing Preference (AUMs)
  - a. Permitted Use: 540 AUMs
  - b. Historical Suspended: 1508 AUMs
  - c. Total 2048 AUMs
2. Season of Use: 05/01 - 09/30
3. Kind and Class: Cow/calf
4. Grazing System: None
5. Percent of Federal Range: 100% Federal Range

### **TO: GRAZING SYSTEM TO BE IMPLEMENTED**

#### **A. Boundary Fence**

Construct a boundary fence between the Pole Canyon Allotment and the Pyramid Lake Indian Reservation in cooperation with the Pyramid Lake Paiute Tribe. Do not authorize livestock grazing until the boundary fence has been constructed.

#### **RATIONALE:**

Construction of a boundary fence would reduce and/or stop the uncontrolled movement of horses from Reservation Lands to the allotment, and allow for implementation of management actions to achieve resource objectives. Without a boundary fence it is not possible to assure forage would be available for livestock, or that short term objectives would be met.

B. Livestock Management

1. Grazing Preference (AUMs)
  - a. Permitted Use: 540 AUMs
  - b. Historical Suspended: 1508 AUMs
  - c. Total 2048 AUMs
2. Season of Use: 06/01 - 09/30
3. Kind and Class: Cow/calf
4. Grazing System: Deferred
5. Percent of Federal Range: 100% Federal Range

**RATIONALE:**

Wild horse monitoring data indicated that there is insufficient yearlong habitat for wild horses. Peak use by wild horses occurred during the summer and early fall, with few wild horses found on the allotment in the winter. Data also indicated that wild horses were dependent on Reservation Lands for habitat during late fall, winter, and early spring. Therefore, allocate available AUMs to livestock.

Livestock did not utilize the allotment during the evaluation period, however wild horse monitoring data indicated that an adjustment in carrying capacity is required to meet Land Use Plan Objectives. Monitoring data indicated 635 AUMs of forage are available. However, since livestock did not use the allotment during the evaluation period, permitted use will remain at 540 AUMs until monitoring data determines that utilization and resource objectives are being met.

Changing the season of use will allow for the majority of use to occur after the critical growth period for key species.

Development of a rest rotation grazing system is not possible due to the small size and topography of the allotment. However, deferring livestock use each year so the majority of use occurs after the critical growth period for key species should allow for seed production, increased plant vigor and seedling establishment.

The late start date for grazing, June 1, will allow for more growth on plants and consequent soil stabilization which will reduce impacts to cultural resources. In addition, no authorization of livestock will occur until a fence is constructed between the Pyramid Lake Indian Reservation and BLM administered lands. The above measures collectively would reduce adverse impacts to cultural resources within the allotment.

#### **TERMS AND CONDITIONS:**

The terms and conditions must be in conformance with the Standards and Guidelines for the Sierra Front - Northwestern Great Basin Resource Advisory Council, approved by the Secretary of the Interior on February 12, 1997.

1. "Pursuant to 43 CFR 10.4(g), the holder of this authorization must notify the authorized officer, by telephone, with written confirmation, immediately upon discovery of human remains, funerary objects, or objects of cultural patrimony (as defined at 43 CFR 10.2). Further, pursuant to 43 CFR 10.4(c) and (d), you must stop activities in the immediate vicinity of the discovery and protect it from your activities for 30 days or until notified by the authorized officer".
2. The authorized officer may modify annual grazing authorizations as long as the modification is consistent with management objectives and remains within the permitted season of use. Requests outside of the permitted season of use will require input from interested publics.
3. Salt and/or mineral blocks shall not be placed within one quarter (1/4) mile of springs, meadows, and riparian habitats.
4. The permittee is required to perform normal maintenance on the range improvement projects as per signed cooperative agreements and section 4 permits prior to livestock turnout.
5. The permittee's certified actual use report is due 15 days after the end of the authorized grazing period.
6. No authorized livestock grazing will occur until the boundary fence is constructed.

#### **GRAZING PERMIT**

A ten year grazing permit will be issued to John and Vella Torvick upon completion of the decision process. The permit will reflect this decision.

## **AUTHORITY:**

The authority for this decision is contained in Title 43 of the Code of Federal Regulations, which states in pertinent parts:

- 4100.0-8 Land use plans - The authorized officer shall manage livestock grazing on public lands under the principles of multiple use and sustained yield, and in accordance with applicable land use plans. Land use plans shall establish allowable resources uses (either singly or in combination), related levels of production or use to be maintained, areas of use, and resource condition goals and objectives to be obtained. The plans also set forth program constraints and general management practices needed to achieve management objectives. Livestock grazing activities and management actions approved by the authorized officer shall be in conformance with the land use plan as defined at 43 CFR 1601.0-5(b).
- 4110.3 Changes in permitted use - The authorized officer shall periodically review the permitted use specified in a grazing permit or grazing lease and shall make changes in the permitted use as needed to manage, maintain or improve rangeland productivity, to assist in restoring ecosystems to properly functioning condition, to conform with land use plans or activity plans, or to comply with the provisions of subpart 4180 of this part. These changes must be supported by monitoring, field observations, ecological site inventory or other data acceptable to the authorized officer.
- 4130.3-1(a) Mandatory terms and conditions - The authorized officer shall specify the kind and number of livestock, the period(s) of use, the allotments(s) to be used, and the amount of use, in animal unit months, for every grazing permit or lease. The authorized livestock grazing use shall not exceed the livestock carrying capacity of the allotment.
- 4130.3-3 Modifications of permits or leases - Following consultation, cooperation, and coordination with the affected lessees or permittees, the State having lands or responsible for managing resources within the area, and the interested public, the authorized officer may modify terms and conditions of the permit or lease when the active grazing use or related management practices are not meeting the land use plan, allotment management plan or other activity plan, or

management objectives, or is not in conformance with the provisions of subpart 4180 of this part. To the extent practical, the authorized officer shall provide to affected permittees or lessees, States having lands or responsibility for managing resources within the affected area, and the interested public an opportunity to review, comment and give input during the preparation of reports that evaluate monitoring and other data that are used as a basis for making decisions to increase or decrease grazing use, or to change the terms and conditions of a permit or lease.

4160.4 Appeals - Any person whose interest is adversely affected by a final decision of the authorized officer may appeal the decision for the purpose of a hearing before an administrative law judge by following the requirements set out in 4.470 of this title. As stated in that part, the appeal must be filed within 30 days after the receipt of the decision or within 30 days after the date the proposed decision becomes final as provided in 4160.3(a). Appeals and petitions for a stay of the decision shall be filed at the office of the authorized officer. The authorized officer shall promptly transmit the appeal and petition for stay and the accompanying administrative record to ensure their timely arrival at the Office of Hearings and Appeals.

4180.1 Fundamentals of rangeland health - The authorized officer shall take appropriate action under subparts 4110, 4120, 4130, and 4160 of this part as soon as practicable but not later than the start of the next grazing year upon determining that existing grazing management needs to be modified to ensure that the following conditions exist.

- (a) Watersheds are in, or are making significant progress toward, properly functioning physical condition, including their upland, riparian-wetland, and aquatic components; soil and plant conditions support infiltration, soil moisture storage, and the release of water that are in balance with climate and landform and maintain or improve water quality, water quantity, and timing and duration of flow.

- (b) Ecological processes, including the hydrologic cycle, nutrient cycle, and every flow, are maintained, or there is significant progress toward their attainment, in order to support healthy biotic populations and communities.
- (c) Water quality complies with State water quality standards and achieves, or is making significant progress toward achieving, established BLM management objectives such as meeting wildlife needs.
- (d) Habitats are, or are making significant progress toward being restored or maintained for Federal threatened and endangered species, Federal Proposed, Category 1 and 2 Federal candidate and other special status species.

#### **APPEAL PROCEDURES**

Any applicant, permittee, lessee or other interested public whose interest is adversely affected by the final livestock grazing portion of this decision may file an appeal under 43 CFR 4160.4 and 43 CFR 4.470. Appeals and petitions for a stay must be filed in person or in writing within 30 days after receipt of the final decision to:

Colin P. Christensen  
AFM Renewable Resources  
Bureau of Land Management  
Winnemucca District Office  
5100 E. Winnemucca Blvd.  
Winnemucca, NV 89445

The appeal shall clearly and concisely state the reason(s) as to why the appellant thinks the final decision is in error.

Should you wish to file a petition for stay, the appellant shall show sufficient justification based on the following standards under 43 CFR 4.21:

1. The relative harm to the parties if the stay is granted or denied.
2. The likelihood of the appellants success on the merits.
3. The likelihood of immediate and irreparable harm if the stay is not granted.
4. Whether the public interest favors granting the stay.

As noted above, the petition for stay must be filed in the office of the authorized officer.

### **WILD HORSE MANAGEMENT DECISION**

Based upon the evaluation of monitoring data for the Pole Canyon Allotment, consultation with the permittee and other interested publics and recommendations from my staff, it is my final decision for wild horses is to:

Establish an AML of 0 wild horses in the Pole Canyon Allotment. Remove all wild horses from the Pole Canyon Allotment during scheduled gathers in the Fox & Lake Range HMA.

#### **RATIONALE:**

There has been a high degree of fluctuation in the number of wild horses found in the allotment from season to season, and from year to year. Wild horse movement patterns observed during the evaluation period indicated that there is insufficient yearlong habitat in the allotment. Peak use by wild horses occurred during the summer and early fall, with few wild horses found on the allotment in the winter. Data indicated there was little if any seasonal movement from upper elevations to lower elevations within the allotment. The majority of wild horses move onto Reservation Lands in late fall and return in late spring, indicating that wild horses are dependent on Reservation Lands for habitat during late fall, winter, and early spring.

Construction of a boundary fence will allow for the implementation of management actions to achieve resource objectives. However, a boundary fence would interrupt the normal yearly movement patterns of wild horses. Given the observed movement patterns, there is a very high likelihood that wild horses would be trapped at upper elevations by the boundary fence during normal to heavy winter weather. This could result in the death of some or all of the trapped animals.

#### **AUTHORITY:**

The authority for this decision is contained in Sec. 3 (a), 3 (b) (1), and 3 (b) (2) of the Wild Free-Roaming Horse and Burro Act of 1971 (Public Law 92-195) as amended, and in Title 43 of the Code of Federal Regulations:

4700.0-6 (a) Policy - Wild horses and burros shall be managed as self-sustaining populations of healthy animals in balance with other users and the productive capability of their habitat.

- 4710.3-1 Herd Management Areas - ... In delineating each herd management area, the authorized officer shall consider the appropriate management level for the herd, the habitat requirements of the animals, the relationships with other users of the public and adjacent private lands, and the constraints contained in 4710.4.
- 4710.4 Constraints on Management - Management of wild horses and burros shall be undertaken with the objective of limiting the animal's distribution to herd areas. Management shall be at the minimum level necessary to attain the objectives identified in approved land use plans and herd management area plans.
- 4720.1 Removal of Excess Animals from Public Lands - Upon examination of current information and determination by the authorized officer that an excess of wild horses or burros exists, the authorized officer shall remove the excess animals immediately ...
- 4770.3(a) Administrative remedies - Any person who is adversely affected by a decision of the authorized officer in the administration of these regulations may file an appeal. Appeals and petitions for stay of a decision of the authorized officer must be filed within 30 days of receipt of the decision in accordance with 43 CFR part 4.

#### **APPEAL PROCEDURES**

If you wish to appeal this wild horse management decision, it may be appealed to the Interior Board of Land Appeals, Office of the Secretary, in accordance with 43 CFR part 4. If you appeal, your appeal must be filed with the Bureau of Land Management at the following address:

Colin P. Christensen  
AFM Renewable Resources  
Bureau of Land Management  
Winnemucca District Office  
5100 E. Winnemucca Blvd.  
Winnemucca, NV 89445

Your appeal must be filed within thirty (30) days from receipt of this decision. The appellant has the burden of showing that the decision appealed from is in error.

If you wish to file a petition pursuant to regulation 43 CFR 4.21 (58 FR 4942, January 19, 1993) for a stay (suspension) of the wild horse decision during the time that your appeal is being reviewed by the Board, the petition for stay must accompany your notice of appeal. Copies of the notice of appeal and petition for a



stay must also be submitted to the:

Interior Board of Land Appeals  
Office of Hearings and Appeals  
4015 Wilson Boulevard  
Arlington, VA 22203

and to the appropriate office of the Solicitor:

Office of the Regional Solicitor  
6201 Federal Building  
125 South State Street  
Salt Lake City, UT 84138-1180

at the same time the original documents are filed with this office.

If you request a stay, you have the burden of proof to demonstrate that a stay should be granted. A petition for a stay is required to show sufficient justification based on the following standards:

1. The relative harm to the parties if the stay is granted or denied.
2. The likelihood of the appellants success on the merits.
3. The likelihood of immediate and irreparable harm if the stay is not granted.
4. Whether the public interest favors granting the stay.

#### WILDLIFE MANAGEMENT

Maintain wildlife populations at the reasonable numbers outlined in the Sonoma- Gerlach MFP-III - 1982:

Mule Deer - ( <u>Odocoileus hemionus</u> )	15 AUMs
Pronghorn - ( <u>Antilocapra americana</u> )	7 AUMs
Bighorn Sheep - ( <u>Ovis canadensis californiana</u> )	37 AUMs

#### RATIONALE:


Analysis of monitoring data indicated that wildlife use did not contribute to the non-attainment of Land Use Plan objectives. Therefore, adjusting reasonable numbers is not warranted.

## FUTURE MONITORING AND GRAZING ADJUSTMENTS

The Winnemucca Field Office will continue to monitor the Pole Canyon Allotment. Monitoring data will continue to be collected to provide the necessary information for subsequent evaluations. These evaluations are necessary to determine if the allotment specific multiple use management objectives are being met and if the Standards for Rangeland health are being achieved under the new grazing management strategy. In addition, these subsequent evaluations will determine if adjustments are required to meet the established allotment specific multiple use management objectives and Standards for Rangeland Health.

The Pole Canyon Allotment is scheduled to be re-evaluated in FY 2004, in conjunction with the Rodeo Creek Allotment.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Colin P. Christensen". The signature is fluid and cursive, with a long horizontal stroke at the end.

Colin P. Christensen  
Assistant Field Manager  
Renewable Resources

**Subject: Fw: Send Picture of Quad**

**Date: Wed, 26 Apr 2000 07:22:38 -0700**

**From: "CATHY BARCOMB" <lazyb113@email.msn.com>**

**To: <mustangs@govmail.state.nv.us>**

----- Original Message -----

From: Roy Edward Leach <leach@phonewave.net>

To: <lazyb113@msn.com>

Sent: Tuesday, April 25, 2000 8:11 PM

Subject: Send Picture of Quad

> Cathy,

> Thank you for lunch.

> ~~Winnemucca is a very beautiful area. It is a very scenic area. It is a very beautiful area. It is a very scenic area. It is a very beautiful area. It is a very scenic area.~~

> ~~Winnemucca is a very beautiful area. It is a very scenic area. It is a very beautiful area. It is a very scenic area. It is a very beautiful area. It is a very scenic area.~~

WINNEMUCCA  
CARSO DIST

> Business: Pole Canyon 2000 FMUD - Fox Range - 1993 Emergency  
> Closure - They shot horses.....remember?

> The FMUD zero the herd. Conflicts with riparian habitat and Indian  
> lands make it impossible to manage the herd. We could agree to this.

> The FMUD authorizes livestock use of the allotment. The AE states  
> that the permittee could not use the allotment because of the  
> horses...BS....

> Use pattern mapping in 1992 did not document severe use by wild  
> horses. This data is completely opposite of what was presented to you  
> in the 1993 Emergency Closure, where the BLM claimed that 90% of the  
> horses were in jeopardy - they gathered and then shot horses.

> In order to justify the FMUD livestock AUMs the BLM did carrying  
> capacity computations in the Appendix 3 of the allotment evaluation.  
> Wild horses utilized the upper canyon of Wild Horse Canyon and the BLM  
> found heavy use in some of the years. Based upon this heavy use of a  
> small portion of the allotment, the carrying capacity computations did  
> not use WEIGHT AVERAGING. This choice in methodology is contrary to the  
> testimony of all the range cons. in the Sonoma-Gerlach Resource Area in  
> the Buffalo Hills Hearings. Cribley, Adams and Sealy stated that BLM did  
> not manage an entire allotment based upon the condition of less than 10  
> percent of the allotment i.e. riparian. In this allotment evaluation,  
> BLM based the entire carrying capacity upon wild horse use of 189 acres  
> of land within a 14,000 acre allotment. - Out right LIE. Then, they  
> fully admit that horses use the allotment differently than cattle, but  
> in this situation the carrying capacity is based upon horse use and they  
> simple allocate it to livestock.

> Dawn agreed that it was useless to try to manage the Fox/Lake Herd  
> based upon land tenure within the HMA. It makes sense, but the  
> methodology employed to justify cattle is an outrageous lie and insult  
> to those who challenged the BLM in Buffalo Hills.

> Jackson - Bottle Creek - Maybe tomorrow.