COPY 5/21/85

BOARD OF TRUSTEES DAVID R. BELDING JACK C. McELWEE GORDON W. HARRIS BELTON P. MOURAS GERTRUDE BRONN, Honorary In Memoriam

WILD HORSE ORGANIZED ASSISTANCE INC.

A Foundation for the Welfare of Wild Free-Roaming Horses and Burros

P. O. Box 555 · Reno, Nevada 8950 Telephone 85/-4 Area Code 702

LOUISE C. HARRISON VELMA B. JOHNSTON, "Wild Horse Annie"

March 21, 1985

Mr. Frank Shields, District Manager Bureau of Land Management 705 East 4th Street Winnemucca, Nevada 89445

Dear Mr. Shields:

Thank you for the opportunity to review the tentative schedule for implementation of the multiple resource management decisions. (4700/1791-NV-027.8)

Please send WHOA the data and the calculations upon which the estimated rates of increases were based; Paradise/Denio-14%, and Sonoma/Gerlach-11%. The projections, using BLM's percentages are flawed. An example is the Calico Mountains (Soldier Meadows/Leadville) portions.

1982-365 + 11% = 40

1983-405 + 11% - 45

1984-450 + 11% = 50

1985-500; yet your estimate is 718.

Using a 14% rate of increase;

1982-365 + 14% = 51

416 + 14% = 581983-

1984-474 + 14% = 66

540; yet your estimate is 718.

Since WHOA still cannot match your projection, we used a higher rate of increase, which we feel is unbelievable; we still out lower than your projections:

365 + 22% = 801982-

445 + 22% = 981983-

1'984-543 + 22% = 119

1985-662

Is BLM trying to tell WHOA that forage conditions are so perfect in the Calico's as to promote an increase above 22%? Therefore WHOA needs to understand how the BLM calculated these estimates and what they were based on.



page two

In addition to the above problem, the asterik at the bottom of page one of the letter 4700/1791 (NV-027.8) implies that there is a consensus of the Buffalo Hills CRMP on the AML. In personal communication with Dick Wheeler, he informs me that myself and Helen Reilly are the horse representatives on that CRMP. I attended ony one meeting, wherein the permittees argued over who was going to get Casey's AUMs. I spoke with Helen Reilly on March 20th and she informs me that she was not a signatory to any such agreement either. So I contacted Rose Strickland, who is a member of that CRMP and attended many meetings. She informs me that no such consensus was reached or even came up. Therefore, we would like to have minutes of the meeting and the attendants where that consensus was reached.

This letter is to inform BLM that WHOA does not and will not support any such levels as referred to in 4700/1791 (NV-027.8). WHOA would greatly appreciate a timely response to these questions.

Most sincerely,

Dawn Y. Lappin (Mrs.) Director

cc: Board of Trustees
David A. Hornbeck
Helen Reilly
Rose Strickland
E. F. Spang



United States Department of the Interior

IN REPLY REFER TO: 4700 (NV-023)

BUREAU OF LAND MANAGEMENT WINNEMUCCA DISTRICT OFFICE

705 East 4th Street Winnemucca, Nevada 89445

May 10, 1985

Mrs. Dawn Y. Lappin, Director WHOA, Inc.
P. O. Box 555
Reno, NV 89504

Dear Mrs. Lappin:

This is in response to your April 9 letter (which we received on April 29, 1985), in which you requested more information on (1) our estimated rates of increase for wild horses and burros and (2) the Buffalo Hills CRMP.

1. Estimated Rates of Increase:

Enclosed is a copy of the Sonoma-Gerlach and Paradise-Denio Resource Areas Management Framework Plan decisions concerning wild horses and burros. As you can see, these decisions establish wild horse and burro numbers at the population levels that existed on July 1st, 1982, unless the other conditions listed in the decisions exist. These decisions were made after several years of public participation.

As you'll recall, we completed our land use planning process in July of 1982. At that time there was no BLM Manual for wild horse and burro management. The present manual was issued after our planning process was completed. Since the passage of the Wild Horse and Burro Act we have received money for inventorying on an infrequent basis.

During our planning process, it was evident that management needs required us to establish the rate of increase for each of our herd use areas. Again this was prior to our present manual. The 11% rate of increase for the herd use areas in the Sonoma-Gerlach Resource Area was calculated as illustrated in the following example:

The Fox Range was inventoried in 1977 and 483 horses were counted. Populations were estimated for 1978 and 1979 using various percentage rates of increase. Using 11% as the rate of increase, these estimates showed 536 horses in 1978 and 595 horses in 1979. The 1980 estimate was 661 horses using the 11% rate. In 1980 we gathered 312 horses from the Fox Range. After the gathering was completed a helicopter inventory counted 340 horses. This was less than 10 animals different than what we had estimated using 11% as the rate of increase.

This same process was followed for several other of the herd use areas in the Sonoma-Gerlach Resource Area (see Table #1 attached). Using gathering information (where it was available) and inventory data, a projected rate of increase of 11%/year consistently came very close to the inventoried numbers.

As a result, 11% was selected as being representative for the Sonoma-Gerlach Resource Area. We realize that this figure is not precise, but has proven to be the best information we have available even to the present time.

The same procedure was followed for the Paradise-Denio Resource Area, but a 14% rate of increase resulted in the most accurate figures (see attached Table #2). These projected rates of increase have been used in the gathering of over 10,000 wild horses from 24 herd use areas. In every case, our projected numbers proved to be sufficiently accurate.

We have not used the present manual procedures because they require flying each herd use area four times in a year to gather the data required. A lack of funding has precluded us from doing this. Also, because of our success with the less intensive methods we have not pursued the more intensive and costly methods. As we approach appropriate management levels for the district and get into more intensive grazing management practices, studies will be conducted to better refine our rates of increase on each herd use area.

2. Buffalo Hills/CRMP:

At a Buffalo Hills CRMP meeting held at the Gerlach High School on June 26, 1984, Paul Jancar discussed with you the proposed appropriate management levels being considered by the Buffalo Hills CRMP group. At that time, you stated that ". . . you had no problems with the proposed numbers and that you would discuss this with your constituents." Since we did not hear from you concerning this matter, we made the assumption that the management levels considered by the CRMP group were acceptable to your organization. The management levels established by the MFP decision (the existing population as of July 1982) was 597 animals, while the proposed appropriate management levels established by the CRMP group is 542 animals.

The Winnemucca District is committed to a strong wild horse and burro program that is balanced with all the other resources. While the Buffalo Hills CRMP has a long way to go before it is completed, we feel that a wild horse herd of 542 animals is reasonable and gives us an excellent base herd to begin monitoring our forage resources from.

At the present time, we are in the process of establishing a strong monitoring program upon which to base our management decisions. However, it takes time to gather the necessary data. With your help we hope to effectively manage viable wild horse and burro herds throughout the district.

I hope this letter and enclosures have answered your questions and addressed your concerns. If not, please call me or my staff.

Sincerely yours,

Frank C. Shields District Manager

Enclosures

cc: State Director, Nevada (N-910)

Sonoma-Gerlach Resource Area

TABLE 1. DATA USED FOR COMPUTING ANNUAL INCREASE IN WILD HORSES AND BURROS

	Actual No. Inventoried		Populati 11%/Year		Actual No. Inventoried	Number Gathered
Herd Use Area	1977	1978	1979	1980	1980	1980
Fox Range	483	536	595	661	340	312
	Actual No.	Projected	Populati	on Levels	Actual No.	
	Inventoried	Using an	11%/Year	Increase	Inventoried	
Herd Use Area	1974	1975	1976	1977	1977	
Buffalo Hills	649	720	800	888	888	
Calicos	452	502	557	618	616	
	Actual No. Inventoried	-	Populati 11%/Year		Actual No. Inventoried	
	1977	1978	1979	1980	1980	
Blue Wing Planning Unit (Includes 10 HUAs	1,909	2,138	2,395	2,682	2,703	
		Gathered	296 Head	Projected	Population	
	Actual No.	After Inv	entory	Levels U	sing An	Actual No.
	Inventoried	In 1977 L	eaving	All property and the same of t	Increase	Inventoried
	1977	W. T. B. W.			1979 1980	1980
Sonoma Planning	2,050	1,75	4	1,947 2	,161 2,399	2,376
Unit						

(Includes 6 HUAs)

Paradise-Denio Resource Area

TABLE 2. DATA USED FOR COMPUTING ANNUAL INCREASE IN WILD HORSES AND BURROS

In 1971 and 1972 inventories were taken on six areas where horses and burros were known to exist. Average percent of increase in the herds over the year was 13.7 percent.

			Annua1
Inventory	1971	1972	Increase
Bloody Runs	78	89	14.1%
Eugene Mountains	65	74	13.8%
Slumbering Hills	70	80	14.3%
Jackson Mountains	97	110	13.4%
McGee Mountain	23	26	13.0%
Black Rock Range	172	195	13.4%
	505	574	13.7%

These inventories were the most consistent of the data collected by the district. There were areas where annual increase was higher and lower. The 14 percent was used as the average. Other areas showed signs of immigration and emigration during the years of inventories. It was assumed that 14 percent would be used as the average.

Sonoma-Gerlach MFP III Wild Horse and Burro 1.1

As Currently Written:

WILD HORSE AND BURRO PROGRAM - NON-CHECKERBOARD LANDS

Establish wild horse and burro numbers by herd use area using the following criteria:

Existing/current WH&B numbers (as of July 1, 1982) will be used as a starting point for monitoring purposes except where one of the following conditions exist:

- 1. Numbers are established by adequate and supportable resource data.
- 2. Numbers are established through the CRMP process as documented in CRMP recommendations and agreed to by the District Manager.
- 3. Numbers are established by formal signed agreement between affected interests.
- 4. Numbers are established through previously developed interim capture/management plans. Plans are still supportable by parties consulted in the original plan. EAs (EARs) were prepared and are still valid.
- 5. Numbers are established by court order.

Sonoma-Gerlach Resource Area

Herd Use Area	Wild	Horses/Burro	5	
Buffalo Hills		272/0	Existing	Numbers
Lava Beds		132/54	. 11	
Fox and Lake Range		434/1	11	
Warm Springs Canyon		294/10	***	
Black Rock Range West		424/0	***	
Seven Troughs		762/105	11	
Granite Range		176/0	11	
Calico Mountains		514/0	. 11	
Selenite Range		12/1	tı	
Blue Wing Mountains		89/48	11	
Tobin Range		19/0	11	
Augusta Mountains		261/0	11	
Kamma Mountains		38/0	-	
Stillwater Range		52/0	11	
Shawaye-Nightingale		254/11	11	

	•		
Herd Use Area	Allotment	Wild Horses/Burros	
Buffalo Hills	Buffalo Hills	272/0	.272
Lava Beds	Blue Wing Seven Troughs	85/54 47/0	•
Fox and Lake Range	Rodeo Creek Pole Canyon	334/1 100/0	
Warm Springs	Soldier Meadows	294/10	29
Black Rock Range West	Soldier Meadows	424/0	
Seven Troughs	Seven Troughs Blue Wing	619/34 143/71	
Granite Range	Buffalo Hills	176/0	176
Calico Mountains	(Buffalo Hills (Calico (Leadville (Soldier Meadows	107/0 42/0 248/0 117/0	107 4Z
Selenite Range	Blue Wing	12/1	107
Blue Wing Mountains	Blue Wing	89/48	555
Tobin Range	Goldbanks Pleasant Valley Pumpernickel Valle South Buffalo	0/0 0/0 17/0 2/0	Bythe HODS Alle dropped 55 south of author Cyn. Drift Jance on
Augusta Mountains	Jersey Valley .	. 261/0	of distance on
Kamma Mountains	Seven Troughs	38/0	Grantes because
Stillwater Range	Pleasant Valley South Rochester Rawhide South Buffalo Jersey Valley Cottonwood Canyon	0/0 36/0 0/0 16/0 0/0 0/0	of critical is letter
Shawave-Nightingale	Blue Wing	254/11	

Change To:

The decision will remain as originally written.

WHB 1.1

Herd Use Area

DISTRICT MANAGER'S DECISION - WILD HORSE AND BURRO PROGRAM - NON-CHECKERBOARD LANDS

Establish wild horse and burro numbers by herd use area using the following criteria:

Existing/current WH&B numbers (as of July 1, 1982) will be used as a starting point for monitoring purposes except where one of the following conditions exist:

- 1. Numbers are established by adequate and supportable resource data.
- Numbers are established through the CRMP process as documented in CRMP recommendations and agreed to by the District Manager.
- Numbers are established by formal signed agreement between affected interests.
- 4. Numbers are established through previously developed interim capture/management plans. Plans are still supportable by parties consulted in the original plan. EAS (EARS) were prepared and are still valid.
- 5. Numbers are established by court order.

Black Rock Range East Paiute Meadows

Paradise-Denio Resource Area

59/0

Owyhee-Bullhead	250/0	CRMP Numbers
Jackson Mountains	215/0	Existing Numbers
McGee Mountain	0/41	Existing Numbers
Black Rock Range East	59/0	Existing Numbers
Herd Use Area	Allotment	Wild Horses/Burros
*		
Owyhee-Bullhead	Little Owyhee	200/0
	Bullhead	50/0
Jackson Mountains	Jackson Mountains	160/0
	Deer Creek	20/0
	Happy Creek	35/0
McGee Mountains	Alder Creek	0/41

Wild Horses/Burros