

February 5, 1999

Ms. Susan Stokke  
BLM-Surprise Field Office  
PO Box 460  
Cedarville, CA 96104-0460

RE: Bare Allotment - Fox Hog HMA

Dear Susan,

The Fox-Hog Herd Management Area is one of several herd management areas within a complex shared between the Winnemucca and Susanville Districts. During the extreme drought and severe winter of 1992-93, the Winnemucca District implemented multiple use Decisions too late to prevent the catastrophic die-off of wild horses in the complex. It is now five years later and the District offers this evaluation to address proper stocking levels for livestock and an appropriate management level for this portion of the wild horse herd in the Fox-Granite Range of Nevada.

In the past, the range conservationist monitored the pastures rested from livestock to determine wild horse impacts to vegetation. This approach had great promise to properly balance wild horses with other ungulate use of key forage species within the herd management area. Unfortunately, the Bare Allotment Evaluation suggests that these monitoring studies were abandoned for a new concept of forage allocation based upon forage production. It is our understanding of the technical manuals that carrying capacities are determined by observed utilization and actual use data collected in compliance to the "Nevada Rangeland Monitoring Handbook". Allocation of available forage is often proportional to ungulates with the goal to achieving a thriving natural ecological balance under the law.

Estimating forage production of riparian and allocating 30% of the tons per acre to wild horses is contrary to previous monitoring studies of this allotment and Bureau of Land

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Management policies. Prior to this evaluation, pastures rested from livestock suffered little damage to stream bank riparian habitat on the Bare Allotment. The 1987 allotment evaluation found that late season use by cow-calf livestock caused overuse of riparian habitats. It appears contrary to monitoring studies to manage wild horse numbers under your approach.

Based upon your approach to allocate 30% of the tons/acre of riparian forage to wild horses, we assume that only 20% has been allocated to livestock and wildlife. This formula would allow less than 100 cows on the allotment. Is that a correct assumption? We could not determine how the carrying capacities for livestock were determined. Previous data suggests that a horse consumed 1.25 AUMs. This is contrary to NAS studies and Bureau calculations. We question if that was for a mature horse or does the District assume that value for foals. Winnemucca District land use plans define an AUM as one adult horse. Did the District weight average use pattern mapping data that abolished the effects of overuse of riparian habitat? Did yield indexing precipitation data exaggerate the stocking levels during drought? Does precipitation data collected in Cedarville, California best represent Fox Mountain that is 50 miles in the Great Basin?

We encourage the District to present alternatives in an environmental assessment to address our concerns.

Sincerely,

CATHERINE BARCOMB  
Administrator