

m 5/22/96

BOB MILLER
Governor

STATE OF NEVADA



CATHERINE BARCOMB
Executive Director



COMMISSION FOR THE
PRESERVATION OF WILD HORSES

1105 Terminal Way
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Reno, Nevada 89502
(702) 688-2626

May 22, 1996

Ms. Helen Hankins
Elko District
Bureau of Land Management
3900 East Idaho Street
P.O. Box 831
Elko, Nevada 89803

Subject: Rock Creek AE - Rock Creek HA

Dear Ms. Hankins:

The Commission for the Preservation of Wild Horses has received the Rock Creek and Andrae Allotment Evaluations. These documents and pending multiple use decisions will determine the appropriate management level for the Rock Creek Herd Area. As a result of last year's emergency gather, the implementation of pending decisions should achieve the multiple use objectives established for these allotments.

According to the land use plans, the Rock Creek Wild Horse Herd Area encompasses the Rock Creek or Squaw Valley/Spanish Ranch Allotments. We will limit our comments to these two allotments.

Page 4, Wild Horse and Burro Use

We appreciate the explanation of the status of the herd area and the data collected since 1978. Based upon the fact that this herd area has the limitations or restraints of private holdings, a new delineation of a herd management area might seem appropriate within this decision making process.

The census and distribution data collected from 1988 to 1992 supports the conclusion that wild horse densities inhibited the seasonal migrations to upper elevations within the herd area. As commonly observed in Central Nevada, subordinate wild horse bands are limited to territories within historical winter ranges. It is reasonable to assume that bands unable to migrate to elevations to escape thermal inversions during the winter or seek better forage during spring and summer would suffer greater foal mortalities.

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Recruitment data collected during drought years of 1992 and 1993 may reflect the population response to high densities or the over population of the herd.

We appreciate the author's assessment of livestock or administrative fence impacts on the free-roaming nature of wild horses. These constraints may be one of the limiting factors to consider as a criteria for the delineation of a herd management area through this decision making process.

It may have been impossible to determine egress and ingress of the Rock Creek Herd from the Little Humboldt, Owyhee, Little Owyhee or Snowstorm Herds. Currently, Winnemucca District has determined appropriate management levels and conducted numerous gathers to achieve these numbers in recent years. Studies exist to determine the mix of these herds with ongoing marking, blood and census work of the Districts.

Page 12, Fisheries/Riparian

The allotment evaluation and multiple use decision will require a Section 7 Consultation from the U.S. Fish and Wildlife Service. It would appear that the Bureau of Land Management has only 10% ownership of lands along streams within the Rock Creek Sub-basin. These situations may require cooperative agreements with private land owners for watershed and/or wild horse management. Cooperative agreements for wild horse numbers or use of private lands could be another criteria for the determination of an appropriate management level or herd management area delineation.

Page 20, Management Evaluation

A statement of purpose should include the determination of a proper herd management area based upon sound criteria and rationales. To be consistent with the Northeastern Great Basin Area - Standards and Guidelines, all statements should include the word "significant" prior to any reference to progress being made towards allotment specific objectives.

Page 23, Wild Horse Actual Use

The data portrayed shows animal unit months determined by use of adult wild horses within the herd area. We appreciate the proper conversion of actual use of one adult horse per animal unit month.

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Page 25, Utilization

Allowable use levels for key forage species were not presented as allotment specific objectives. We recognize and appreciate the use of these essential factors in the evaluation of data to determine if present management is protecting the health of the land.

Page 26, Utilization Based Adjustments

We do not support the use of crop yield index adjustments to observed utilization of riparian or key areas. Though these areas are of minor acreage, their importance to the ecosystem is heavily weighted by the land use plan, regulations and policies.

Page 38, Wild Horse Habitat

Monitoring studies that found a distinction between wild horses and livestock use are valid. It has been commonly observed that wild horses can make exclusive and heavy use of open stringer meadow complexes, but commonly avoid steep or restrictive canyons with streams. Efforts to distinguish use prior to livestock turnout would be impossible with yearlong use by livestock. We embrace the author's desire to develop a livestock grazing system that would allow for monitoring studies to validate the pending multiple use decisions.

Page 39, Removals

Gathers conducted in 1994 and 1996 totaled 407 wild horses. These efforts to protect the public's investment in the Mahogany Springs Fire Rehabilitation Project were necessary. We assume that more than 407 horse were captured. Age, sex and recruitment data are collected during these gathers. It would be appropriate to prepare a table exhibiting these data in this allotment evaluation. A model of the present population would be appropriate for the pending gather plan.

Page 40, Establishing Appropriate Management Level

We do not support options that determine carrying capacities or allocation of forage based upon practices that compromise over-utilization of key forage or riparian areas.

Option 5 - Herd Stability Numbers presents an opportunity to establish an appropriate management level and herd management area compatible with natural resources. Current rangeland monitoring data should be able to show over utilization or declining trends in

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key forage species in Burner Hills/McFadden Springs area. If this winter range is a limiting factor, the specific removal of sub-dominate bans should provide for the surviving herd to migrate seasonally. Livestock management should provide for pre-turnout monitoring of wild horse use to validate the pending multiple use decision for wild horses. Re-alignment or designation of a herd management area must consider existing fences, private lands, adequate winter and adequate summer ranges to sustain a free-roaming and viable wild horse herd.

Page 79, Conclusions

As previously mention, the Standards and Guidelines require the District to establish "significant" progress in meeting objectives. Practically, objectives are either met or not met. Progress must be measured in respect to "significant" qualitatively or statistically.

Page 90, Objective 18

We strongly support the objective that establishes an allowable use level for key forage and allocates its utilization to ungulate by season. This type of an objective dissolves any need for vague procedures that compromises resource damage of keys species or riparian areas. Properly monitored, this objective could easily establish an appropriate management level based upon use of the Rock Creek Herd winter range at McFadden Springs/Burner Hills area.

Page 114, Wild Horse Use Area

We can support the designation of a wild horse management area for the Rock Creek Wild Horse Herd. Criteria for water, forage and thermal cover should be the basis or rationale for any option. Land ownership data should be quantified to allow for feasible options. The multiple use decision should only consider existing conditions.

Please provide additional rangeland monitoring data for key areas and additional herd area delineation data to support Alternative G. Future monitoring studies must distinguish livestock use from wild horse use of key forage species or key management areas to validate the appropriate management level of 250 horses. Past gather data should provide insight on the composition of horses left from the pending gathers that must comply with the BLM adoption policy. Recruitment data of older mares from past gathers will provide for estimating herd growth to plan future gathers.

Any alternative dependent on land exchange or extensive range improvement projects provides little immediate relief to damaged resources within the herd area.

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SUMMARY

The Commission for the Preservation of Wild Horses embraces the effort and depth of the Elko District's data and assessment of wild horse data for the Rock Creek Herd. We seek the implementation of a long term solution to sustain a viable herd in a thriving natural ecological balance with resources and other uses. Private land and fence conflicts are in need of resolution to establish a real herd management area.

An appropriate management level established upon herd behavior, distribution and utilization of it's limiting key winter forage resource would be a sound approach. It is unfortunate that livestock were not managed in a manner to allow for precise monitoring studies, but this shortcoming could be resolved in the multiple use decisions. Herd areas or herd management areas need to be adjusted with present data, rather than sustaining delineations made over twenty five years ago.

Carrying capacities and forage allocations should avoid practices that compromise the very resources that require management changes. Allocation proportions, based upon conditions over 10 years ago, are meaningless and not sound rationales.

We encourage you to provide the suggested measures from our comments to the pending decision. We hope that this decision will provide immediate relief to damaged resources and provide a practical and feasible solution in the long term.

Sincerely,

CATHERINE BARCOMB
Executive Director

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Removal criteria has been established based upon the adoption policies of the Bureau of Land Management. Specific criteria needs to be established for the surviving wild horse herd. Again, previously collected data can assist in determining age and sex criteria for this gather.

Sincerely,



CATHERINE BARCOMB
Executive Director