WELLS RESOURCE MANAGEMENT PLAN

DRAFT WILD HORSE AMENDMENT and ENVIRONMENTAL ASSESSMENT

Prepared by
DEPARTMENT OF INTERIOR
BUREAU OF LAND MANAGEMENT
ELKO DISTRICT

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The Wells Resource Management Plan Draft Wild Horse Amendment and Environmental Assessment outlines and analyzes three alternatives for the management of wild horses in the southeast part of Elko County, Nevada by the Wells Resource Area, Elko District of the Bureau of Land Management.

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I. INTRODUCTION

Through a review of wild horse management in the Wells Resource Area, it was determined that problems were occurring with wild horses grazing on private lands in checkerboard areas (areas with alternating sections of public and private lands). As per P.L. 92-195, wild horses must be removed from unfenced private land when requested by the private landowner. Requests have been made to remove wild horses from private land in the checkerboard areas. These requests have been made in writing and have established horse locations on private land by legal description. The most reasonable way to address the problem of wild horses using private lands in checkerboard areas is complete removal of horses. Simply moving horses to adjacent public land areas will not keep them from returning to the private land.

It was also determined that there were no wild horse herd management areas (HMA) designated for the maintenance and management of wild horses in the Wells Record of Decision (ROD) and Approved Resource Management Plan (RMP). As a result of these determinations, the decision was made by the Nevada State Director to amend this RMP to correct these problems.

Purpose and Need for the Amendment:

The purpose of this amendment is to establish wild horse HMAs, solve the problems with checkerboard land pattern conflicts, identify habitat requirements and management practices, establish initial herd size, develop factors for adjustments in herd size, identify constraints on other resources, and combine herd areas for the purpose of improving management of wild horses.

Location:

The Wells Resource Area is located in the northeast corner of Nevada and encompasses approximately the east half of Elko County (see Map 1). It contains 5.7 million acres of which 4.3 million are public lands administered by the Bureau of Land Management (BLM). The six wild horse herd areas (areas where wild horses existed in 1971 at the time of the passage of the Wild Horse and Burro Act) that will be discussed in this amendment are located in the southern half of the resource area (see Map 2, same as Map 3-4 in the Draft Wells RMP and EIS).

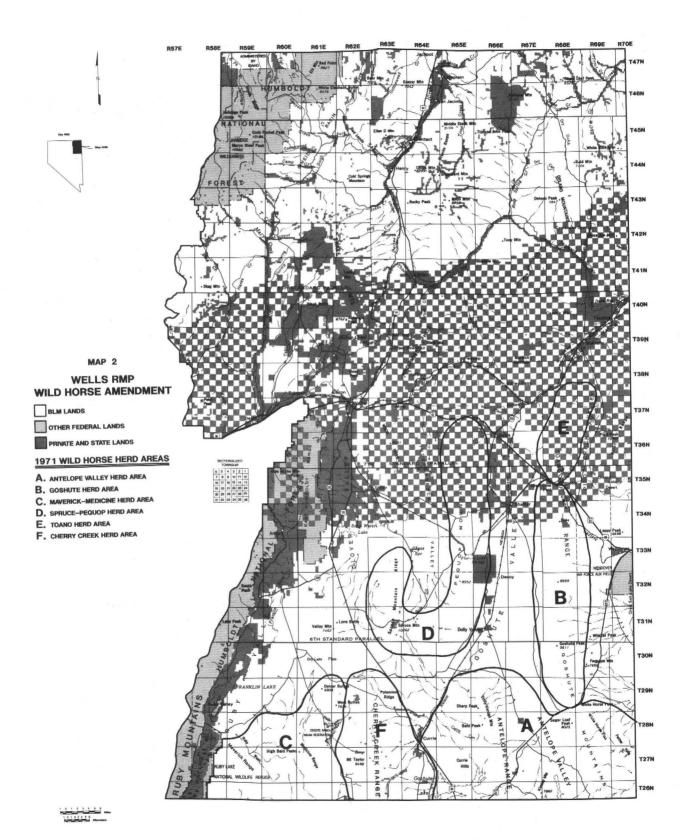
Wells Resource Area

NEVADA

MAP 1

WELLS RMP
WILD HORSE AMENDMENT

GENERAL LOCATION MAP



Planning Process:

The land use planning process, as mandated by the Federal Land Policy and Management Act (FLPMA) of 1976, is designed to enable BLM to address the issues and concerns of the public in outlining the management of the public lands within logical planning areas. This process involves nine basic planning steps. They are: 1) Identification of Issues; 2) Development of Planning Criteria; 3) Inventory and Data Collection; 4) Analysis of the Management Situation; 5) Formulation of Alternatives; 6) Estimation of Effects of Alternatives; 7) Selection of the Preferred Alternative; 8) Selection of the Proposed Plan; and 9) Monitoring and Evaluation.

This draft amendment will address step 1 through step 7. For additional information, see the existing Draft Wells RMP and Environmental Impact Statement (EIS), the Proposed Wells RMP and Final EIS, and the Wells RMP Record of Decision and Approved Plan.

II. PLANNING ISSUES AND CRITERIA

During this amendment's 30 day scoping period, from January 28, 1992 to March 6, 1992, the public was asked by BLM to help identify planning issues and planning criteria to be used for the management of wild horses in the Wells Resource Area. The public was also asked to help identify alternatives to be evaluated in this amendment.

The following is a discussion of the purpose of planning issues and planning criteria. This discussion also outlines the issues and criteria that will be used to guide the development of this amendment.

Planning Issues:

Issues drive the resource management planning process and indicate specific concerns which the BLM and the public may have regarding the management of specific resources in a planning area. An issue is defined as an opportunity, conflict, or problem pertaining to the management of public lands and associated resources. Identification of issues orients the planning process so that the efforts of an interdisciplinary analysis and documentation are directed toward resolution of the issues.

It has been determined that this amendment will address only the issue of wild horse management. In addressing this issue, the amendment will respond to the following planning questions:

- In what herd areas will wild horses be maintained and managed by BLM?
- What wild horse habitat requirements and management practices are needed for each HMA?
- 3. At what population levels will wild horses be managed?
- 4. How will adjustments be made in management levels?
- 5. What constraints, if any, will be placed on other resource uses?

Planning Criteria:

Planning criteria are formulated to guide the development of a resource plan or an amendment to the resource plan. Planning criteria are derived from laws, Executive Orders, regulations, planning principles, BLM national and state guidance, consultation with interest groups and the general public, and available resource information of the area. Planning criteria help to: 1) set standards for data collection; 2) establish alternatives to be analyzed; and 3) select the preferred alternative.

The planning criteria for this RMP amendment are:

- Establish wild horse HMAs where wild horses occurred on December
 15, 1971 and where land ownership patterns are compatible with management of wild horses.
- Establish management levels by determining minimum numbers necessary to maintain viable herds and maximum numbers compatible with maintaining a thriving natural ecological balance and multiple use relationships.

III. ALTERNATIVES, INCLUDING THE PREFERRED ALTERNATIVE

Alternative 1. No Action Alternative:

The management of wild horses will continue under the existing short and long-term management actions (management determinations) as they currently exist in the Approved Wells RMP (see Map 2).

Objectives:

 To continue management of the six existing wild horse herds consistent with other resource uses.

Short and Long-Term Management Actions:

- 1. Continue to monitor wild horse populations and habitat conditions.
- Conduct wild horse gatherings as necessary and maintain populations within a range from 550 to 700 animals. The Toano Herd would be maintained at 20 animals (see Table 1).
- Construct six water development projects (catchment type) with storage tanks and troughs.
- Remove wild horses from private lands if required.

TABLE 1
WILD HORSE HERD AREA CHARACTERISTICS¹

	H	lerd Size	Resource Conflicts		
Herd Area	1978	1981²	Fences	Humans ³	Conflict Allotments
Antelope Valley	449	164			9
Cherry Creek	74	64	х		Currie, West Cherry Creek
Goshutes	129	120		X	Big Springs, Pilot
Maverick-Medicine	112	244	X	-	Maverick, West Cherry Creek, Spruce, Odgers, Currie
Spruce-Pequop	-	80	Х	х	Big Springs, Spruce
Toano	-	20	х	х	Big Springs, Pilot
Totals	764	692		-	-

¹ The information in this Table has been brought forward from the Draft Wells RMP to show the average number of wild horses by herd area that were to be maintained within the range of 550 to 700 animals for the Wells Resource Area (see Table 3-3 on page 3-8 in the Draft Wells RMP and EIS).

Alternative 2. Preferred Alternative:

This alternative combines the management of the six existing herd areas in the Wells Resource Area into four herd management areas.

All areas of checkerboard land ownership, including all of the Toano Herd Area and portions of the Goshute and Spruce-Pequop Herd Areas, will be managed as horse free areas. The management of wild horses begins at initial herd size and will be maintained in designated HMAs. Adjustments will be based on monitoring and grazing allotment evaluations. Wild horse numbers in excess of the initial herd size would be removed within statewide priorities.

Objectives:

- To manage wild horses only on areas where requests for removal of animals will not hinder management.
- 2. To manage wild horses within HMAs and to maintain a thriving natural ecological balance consistent with other resource needs.
- 3. To combine portions of the wild horse herd areas where horses intermix between herd areas.

² The total for 1981 is less than 1978 because animals were removed in 1980.

³ Requests have been received by various private landowners to remove wild horses from unfenced private lands since 1987.

Management Determinations:

1. Delineate four HMAs as follows (see Map 3):

Antelope Valley Herd Area Goshute Herd Area Maverick-Medicine Herd Area Spruce-Pequop Herd Area

- Combine the east portion of the Cherry Creek Herd Area (44 percent of the total herd area) with the Antelope Valley HMA and the west portion if the Cherry Creek Herd Area (56 percent) with the Maverick-Medicine HMA.
- Remove all wild horses from checkerboard areas, which include all of the Toano Herd Area and portions of the Goshute and Spruce-Pequop Herd Areas and manage them as wild horse free areas.
- 4. Remove sufficient wild horses to attain the initial herd size and maintain populations at a level which will maintain a thriving natural ecological balance consistent with other resource values.
- 5. Management determinations for each HMA are outlined in Table 2 and shown on Map 3. The management determinations include the development of eight water sources to improve wild horse distribution, modification of approximately one mile of existing fence so as not to impede wild-free roaming behavior, and construction of approximately eighteen miles of new fence to prevent the return of wild horses to checkerboard land patterns.

Alternative 3. Current Numbers Alternative:

The management of wild horses will continue with current numbers and any adjustments will be based on monitoring and grazing allotment evaluations.

All areas of checkerboard land ownership, including all of the Toano Herd Area and portions of the Goshute and Spruce-Pequop Herd Areas, will be managed as horse free areas. Adjustments will be based on monitoring and grazing allotment evaluations. Wild horse numbers in excess of the optimal herd size established by allotment evaluations would be removed within statewide priorities for removal of wild horses.

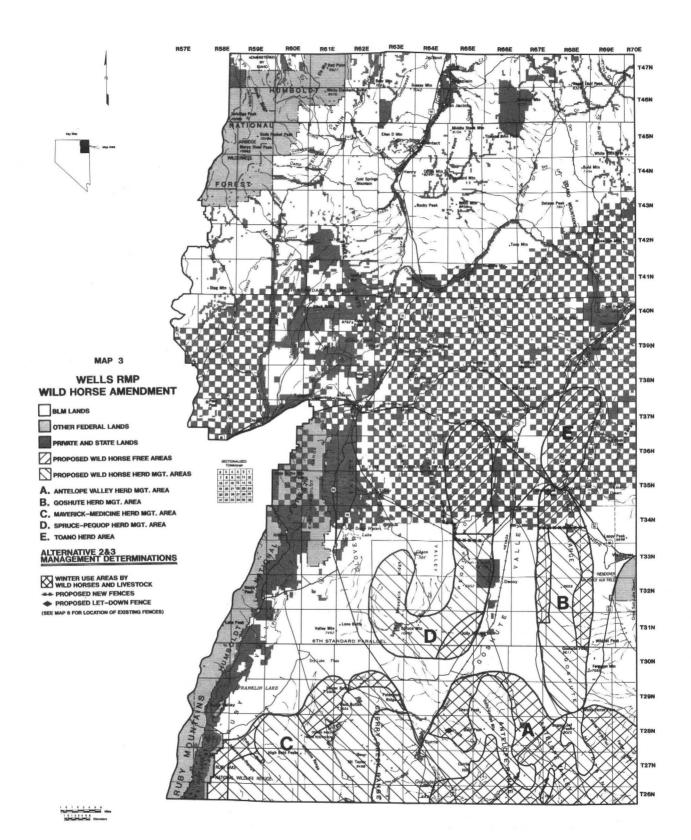
Objectives:

- To manage wild horses only on areas where requests for removal of animals will not hinder management.
- To manage wild horses within HMAs and to maintain a thriving natural ecological balance consistent with other resource needs.
- 3. To combine portions of the wild horse herd areas where horses intermix between herd areas.

TABLE 2 MANAGEMENT DETERMINATIONS FOR HERD MANAGEMENT AREAS - ALTERNATIVE 2

	Management Determinations				
		Herd Size ¹			
Herd Mgt Areas	Wild Horse Habitat Requirements and Management Practices	Initial ²	Long-Term	Herd Size Adjustment Factors	Other Resource Constraints
Antelope Valley ³	Develop additional waters on summer range. Modify the existing fence between the Currie and Spruce Allotments to a let-down fence (two half-mile segments).	240	Adjustments will be based on monitoring and grazing allotment evaluations.	Utilization of key forage species by wild horses in areas used in common will not exceed an average of ten ⁴ percent prior to entry by livestock.	Utilization by all grazing animals will not exceed 55 percent on key forage species by March 31st on winter range. New fencing will only be used when other practices such as control of water, salting, and herding have proved ineffective in providing proper distribution of all grazing animals.
Goshute	Develop additional waters on summer range. Construct up to nine miles of drift or gap fences, if necessary, to prevent wild horse drift north onto checkerboard lands.	160	Same as above.	Same as above.	Same as above.
Maverick-Medicine ³	Develop additional waters to provide better distribution.	389	Same as above.	Same as above.	Same as above.
Spruce-Pequop	Develop additional waters on summer range. Construct a fence (approximately nine miles) to prevent wild horse drift north onto checkerboard lands.	82	Same as above.	Same as above.	Same as above.
Total		871			

- ¹ Numbers are in animal units.
- The initial numbers were developed through the use of vegetative studies. Monitoring data from 1990-1992 indicates that horse use has increased on the winter range while livestock use has decreased in common use areas.
- The initial number of horses for the Cherry Creek Herd Area have been incorporated into both the Antelope Valley (25 percent) and Maverick-Medicine (75 percent) HMAs.
- ⁴ Ten percent use of key forage species (midpoint of slight use category) by wild horses prior to entry by livestock is the level that can be used and still not exceed the total use of 55 percent by March 31st in areas used in common by all grazing animals.



Management Determinations:

1. Delineate four HMAs as follows (see Map 3):

Antelope Valley Herd Area Goshute Herd Area Maverick-Medicine Herd Area Spruce-Pequop Herd Area

- Combine the east portion of the Cherry Creek Herd Area (44 percent of the total herd area) with the Antelope Valley HMA and the west portion if the Cherry Creek Herd Area (56 percent) with the Maverick-Medicine HMA.
- Remove all wild horses from checkerboard areas, which include all of the Toano Herd Area and portions of the Goshute and Spruce-Pequop Herd Areas and manage them as wild horse free areas.
- 4. Management determinations for each HMA are outlined in Table 3 (see following page) and shown on Map 3. The management determinations include the development of eight water sources to improve wild horse distribution, modification of approximately one mile of existing fence so as not to impede wild-free roaming behavior, and construction of approximately eighteen miles of new fence to prevent the return of wild horses to checkerboard land patterns.

Summary

The following two tables summarize the wild horse herd size and acreage by ownership category for each herd area for the three alternatives discussed above:

Table 4 summarizes the wild horse herd size by alternative.

TABLE 4
WILD HORSE HERD SIZE BY ALTERNATIVE

	Herd Size by Alternative				
Herd Areas	Alternative 1 (No Action)	Alternative 2 (Preferred)	Alternative 3 (Current Numbers)		
Antelope Valley	164	240	581		
Cherry Creek	64	(combined)	(combined)		
Goshute	120	160	330		
Maverick-Medicine	244	389	770		
Spruce-Pequop	80	82	82		
Toano	20	0	0		
Total	692	871	1,763		

TABLE 3 MANAGEMENT DETERMINATIONS FOR HERD MANAGEMENT AREAS - ALTERNATIVE 3

	Management Determinations						
		Herd Size ¹					
Herd Mgt Areas	Wild Horse Habitat Requirements and Management Practices	Current ²	Long-Term	Herd Size Adjustment Factors	Other Resource Constraints		
Antelope Valley ³	Develop additional waters on summer range. Modify the existing fence between the Currie and Spruce Grazing Allotments to a let-down fence (two half-mile segments).	581	Adjustments will be based on monitoring and grazing allotment adjustments.	Utilization of key forage species by wild horses in areas used in common will not exceed an average of ten ⁴ percent prior to entry by livestock.	Utilization by all grazing animals will not exceed 55 percent on key forage species by March 31st on winter range. New fencing will only be used when other practices for livestock management, such as, control of water, salting, and herding have proved ineffective in providing proper distribution of all grazing animals.		
Goshute	Develop additional waters on summer range. Construct up to nine miles of drift or gap fences, if necessary, to prevent wild horse drift north onto checkerboard lands.	330	Same as above.	Same as above,	Same as above.		
Maverick-Medicine ³	Develop additional waters to provide better distribution.	770	Same as above.	Same as above,	Same as above.		
Spruce-Pequop	Develop additional waters on summer range. Construct a fence (approximately nine miles) to prevent wild horse drift north onto checkerboard lands.	82	Same as above.	Same as above.	Same as above.		
Total		1763					

¹ Numbers are in animal units.

² The current number of wild horses were determined by using a 20 percent annual increase. This percentage is a result of data obtained from wild horse gathers conducted statewide. These totals were calculated by using the number of foaling seasons from the last inventory through the time this amendment is projected to be completed in October, 1992.

The current number of horses for the Cherry Creek Herd Area have been incorporated into both the Antelope Valley (25 percent) and Maverick-Medicine (75 percent) HMAs.

⁴ Ten percent use of key forage species (midpoint of slight use category) by wild horses prior to entry by livestock is the level that can be used and still not exceed the total use of 55 percent by March 31st in areas used in common by all grazing animals.

Table 5 displays the acreage by ownership category of the wild horse herd areas for each alternative. Approximately 44 percent of the current Cherry Creek Herd Area is proposed to be combined with the Antelope Valley HMA and 56 percent combined with the Maverick-Medicine HMA under Alternatives 2 and 3.

TABLE 5
ACREAGE OF WILD HORSE HERD AREAS

	Acres by Owners	hip Category	Totals		
Herd Areas	Public Lands	Private Lands	Alt 1	Alt 2 & 3	
Antelope Valley	400,000	1,500	401,500	463,540	
Cherry Creek	138,000	3,000	141,000	(combined)	
Goshute	266,800	16,000	282,800	250,800¹	
Maverick-Medicine	207,000	500	207,500	286,460	
Spruce-Pequop	172,000	34,000	206,000	138,000²	
Toano	57,500	57,500	115,000	_ 3	
Total	1,241,300	112,500	1,353,800	1,138,800	

The reduction in acreage between Alternative 1 and Alternatives 2 and 3 is because approximately 32,000 acres within checkerboard land areas will be managed as a wild horse free area.

IV. AFFECTED ENVIRONMENT

The Affected Environment section provides additional information to assist the reader in understanding the existing situation and the current problems encountered with managing wild horses in the Wells Resource Area. For a more detailed discussion of the environment within the areas of concern, refer to the Draft Wells Resource Management Plan and Environmental Impact Statement of May, 1983.

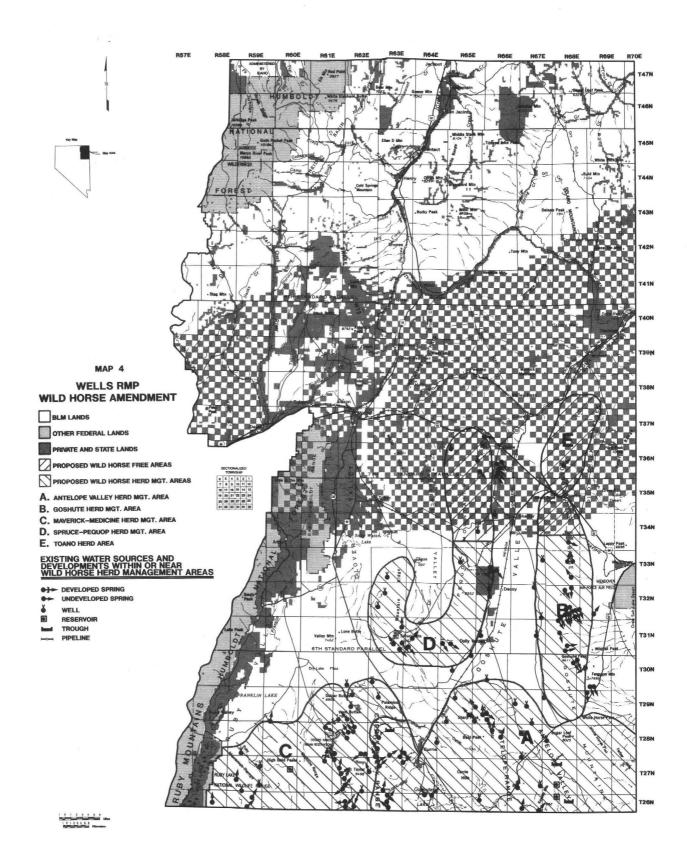
The following additional information is displayed by resource category:

WATER

Six water developments were identified to be developed under the existing Wells RMP. Two of these waters have been developed (see Map 4) and four remain to be developed. Four additional waters need to be developed to provide adequate water for wild horses. Their locations will be specifically identified during HMA plan preparation and will be constructed as funds become available.

The reduction in acreage between Alternative 1 and Alternatives 2 and 3 is because approximately 68,000 acres within checkerboard land areas will be managed as a wild horse free area.

This area will be managed as a wild horse free area.



Numerous springs within HMAs provide an adequate quantity of water for grazing animals, however, water quality is generally poor. Current water quality is poor as springs are trampled and water is degraded by mud and fecal matter.

Inadequate water sources exist on the west side of the Goshute Mountains, Medicine Range, Currie Hills, and the area east of U.S. Highway 93 in the Antelope Valley HMA.

There are also wells developed with private funds located within the HMAs that are pumped only when livestock are present and are, therefore, not considered permanent or dependable water sources for wild horses.

WILD HORSES

The most recent inventory information on wild horse numbers is listed in Table 6 below.

TABLE 6
WILD HORSE INVENTORY INFORMATION

Herd Area	Number of Horses	Date of Inventory	Projected Current No.
Antelope Valley	336	2/91	527
Cherry Creek	180	7/91	216
Goshute	229	3/90	330
Maverick-Medicine	507	7/91	608
Spruce-Pequop	193	6/91	232
Toano	28	10/89	49
Totals	1,473		1,962

The current numbers of wild horses were determined by using a 20 percent annual increase. This percentage is a result of data obtained from wild horse gathers conducted statewide. Totals were calculated by using the number of foaling seasons from the last inventory through the time this amendment is projected to be completed in October, 1992.

Problems exist with the current fencing between the Currie and Spruce Allotments. Fences have impeded wild horse movements affecting wild-free roaming behavior. Wild horses have run into fences not only causing damage to the fence, but also injury or death to themselves.

The horses on unfenced private lands within the checkerboard land pattern areas, are using private forage and water. The waters are also being trampled and water quality degraded by mud and fecal matter.

The ridge line in the Cherry Creek Mountains essentially divides the current Cherry Creek Herd Area. Horses that summer on the Cherry Creek Mountains and Cottonwood Basin also winter in the Maverick-Medicine HMA. Horses on the east side of the Cherry Creek Mountains intermingle with horses from Antelope Valley HMA.

VEGETATION

The availability of forage in the winter use areas is considered the most limiting factor for wild horses. The key species for winter use areas are White sage and Indian ricegrass (for a complete listing of vegetative types, please refer to pages 3-25 through 3-30 of the Draft Wells RMP).

It is important to provide forage adequate to carry wild horses and livestock through the winter use period without exceeding the utilization objectives of 55 percent on key grass and shrub species. The 55 percent utilization level is in accordance with the monitoring guidelines set forth in the Nevada Rangeland Monitoring Handbook.

The current utilization objective for wild horse grazing on winter use areas, prior to the entry of livestock which occurs between November 1st and December 31st, has been established at an average of ten percent (see footnote 4 on Tables 2 and 3) of current years growth on key grass species such as Indian ricegrass (see Table 6). Limiting wild horse use to ten percent on key grass species, prior to the entry of livestock, should leave enough forage to carry wild horses and livestock through the winter use period and not exceed utilization objectives. Ten percent use is the midpoint of the slight use category and managing for this utilization level will maintain or improve vegetation condition and maintain a thriving natural ecological balance. Wild horse use has exceeded this utilization limit on winter use areas within three of the herd areas as shown in Table 7.

TABLE 7
WILD HORSE UTILIZATION ON WINTER USE AREAS
PRIOR TO ENTRY BY LIVESTOCK

Herd Management Area (Area data taken)	Key Species	Percent Utilization by Wild Horses Prior to Livestock Use	Date Utilization Measured
Antelope Valley (Dolly Varden)	Indian ricegrass	48	11/7/90
Goshute (West side)	Indian ricegrass	59	12/7/90
Maverick-Medicine (North side)	Indian ricegrass	40	10/16/91

Most of the wild horses that occupy the above three herd areas concentrate their winter use in the portion of the herd area where excessive utilization has been recorded (see Map 3). On October 16, 1991, use on the north side of the Maverick-Medicine HMA was recorded at 40 percent. By March 3, 1992, combined use in the same area was 80 percent. Very little signs of livestock were observed in the area.

Wild horse distribution needs to be improved to reduce concentration areas around water. Trampling and overuse of vegetation leads to death of plants resulting in bare ground. This leads to soil compaction and these areas do not recover easily.

LIVESTOCK

The location of the grazing allotments in relation to the 1971 Wild Horse Herd Area are shown on Map 5. Grazing systems have been implemented on the Currie, West Cherry Creek, and North Butte Valley Allotments. Construction of the few fences to implement these systems were built to accommodate the normal movement patterns of wild horses (please refer to Table 2-1 on pages 2-3 through 2-6 of the Draft Wells RMP and EIS for a listing of livestock grazing preferences (AUMs) by allotment). Existing livestock fences and allotment boundaries in relation to proposed wild horse herd management areas are shown on Map 6.

WILDLIFE

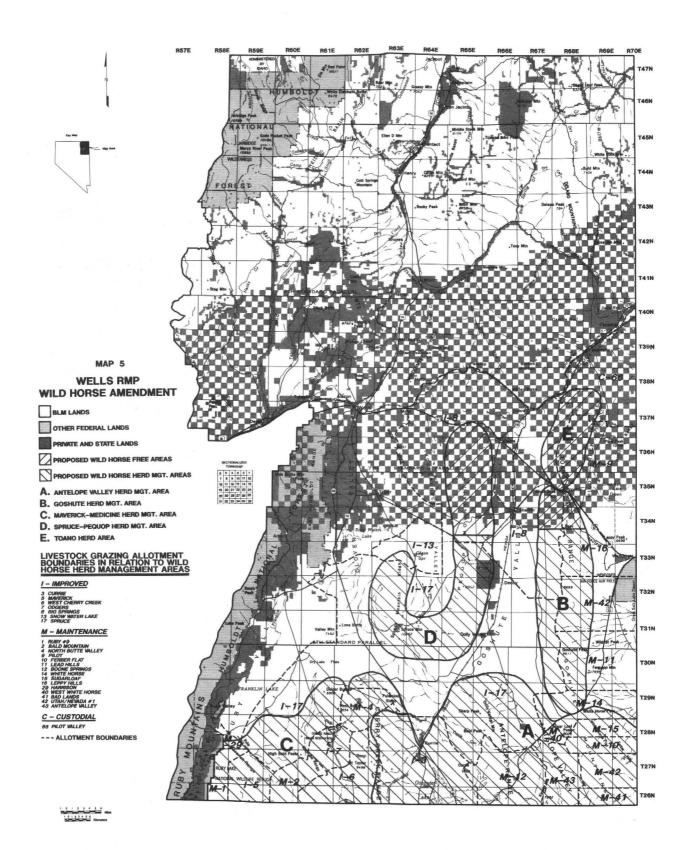
(Please refer to Appendix A3-1 on page A3-2 of the Draft Wells RMP and EIS for a listing of existing and reasonable numbers for wildlife.)

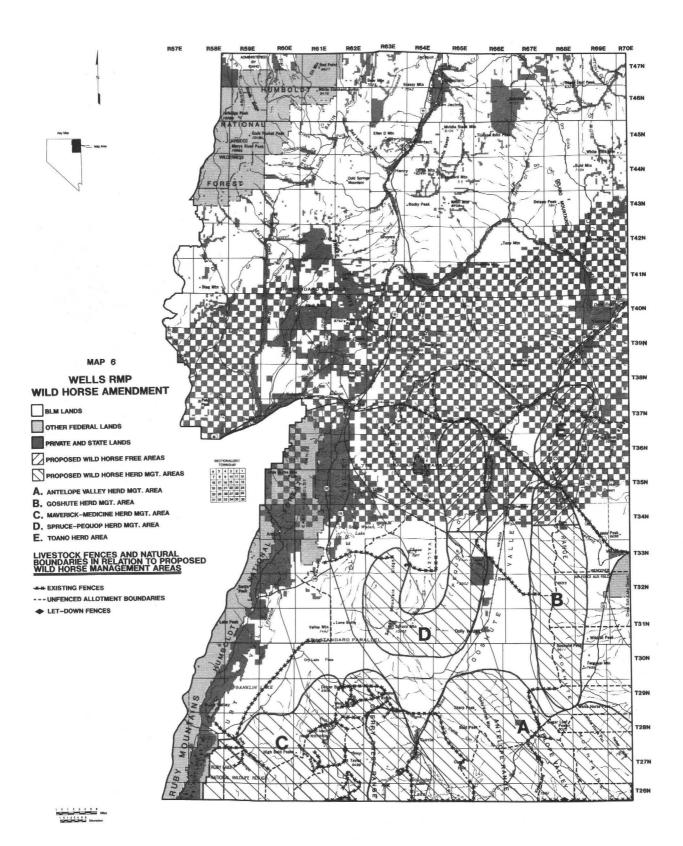
V. ENVIRONMENTAL CONSEQUENCES

This section outlines the environmental consequences by alternative that will result from implementation of the management determinations listed above. These projections are based on available information and knowledge of the area by personnel in the Wells Resource Area and the Elko District. Any numbers given are approximate and are used as a basis to quantify impacts. The reader should not infer that they reflect exact or precise totals.

Alternative 1. No Action Alternative:

- Four additional waters proposed in Alternatives 2 and 3 would not be developed, thus
 not helping provide for better distribution of horses in all herd areas. This will continue
 to create grazing pressure on vegetation near water causing reduced plant vigor and
 poor vegetative condition. The springs will continue to be trampled and water quality
 degraded by mud and fecal matter.
 - Wild horse drift would continue to be limited between the Currie and Spruce Allotments, thus affecting the wild free-roaming nature for some horses in the Antelope HMA.
- Wild horses would continue to exist in the checkerboard areas and occupy the entire 1971 herd areas. The difficulty of keeping wild horses off alternate sections of unfenced private lands would continue in the checkerboard areas thus allowing continued use of 107,500 acres of unfenced private lands.
- 3. The Cherry Creek Herd Area would continue to be managed as a separate and distinct herd area, but would not be reflective of the actual on-the-ground occupation and movement of wild horses into the adjoining Antelope Valley and Maverick-Medicine HMAs. This would result in inefficient planning, monitoring, and management of wild horses in these three herd areas.
- 4. Wild horse numbers have not been maintained to the levels identified in the Wells ROD and RMP as a result of recent court rulings. This has resulted in overuse of vegetation and has caused horses to begin moving outside of herd area boundaries because of overcrowding.





Alternative 2. Preferred Alternative:

The development of eight water sources would provide for higher quality water and better distribution of water for all animals. Development of existing springs would provide better quality water and development of new waters would improve distribution and reduce pressure on vegetation around existing waters.

The modification of the allotment boundary fence between the Currie and Spruce Allotments will allow for the wild-free roaming behavior of wild horses in the Antelope Valley HMA. The fence will be modified to a let-down fence in areas where horses have continually damaged the fence. This portion would be let down when livestock are not in the area not only allowing free movement of wild horses between the allotments, but also preventing injury to horses that may otherwise run into the fence. During the period of time the fence would be let down corresponds to wild horse movements between the allotments.

Maintaining initial herd size would reduce competition and tendency for wild horses to move outside of wild horse HMAs. With increasing horse numbers, bands within the HMAs compete for space and forage.

- 2. Removal of the checkerboard lands from areas where wild horses would be maintained and managed would reduce or eliminate most conflicts, such as consumption of private forage and water, on 107,500 acres of unfenced private lands.
- Combining the Cherry Creek Herd Area with the Antelope Valley and Maverick-Medicine HMAs will more accurately reflect the actual on-the-ground occupation and movement of wild horses and allow for more efficient planning, monitoring, and management of wild horses.
- 4. Establishing initial herd size will maintain a thriving natural ecological balance consistent with other multiple uses.

Alternative 3. Current Numbers Alternative:

 Higher quality water sources and better distribution of water would provide improved wild horse habitat. Development of existing springs would provide better quality water and development of new waters would improve distribution and reduce pressure on vegetation around existing waters.

The modification of the allotment boundary fence between the Currie and Spruce Allotments will allow for the wild-free roaming behavior of wild horses in the Antelope Valley HMA. The fence will be modified to a let-down fence in areas where horses have continually damaged the fence. This portion would be let down when livestock are not in the area not only allowing free movement of wild horses between the allotments, but also preventing injury to horses that may otherwise run into the fence. During the period of time the fence would be let down corresponds to wild horse movements between the allotments.

Removal of excess wild horses would be delayed until completion of the allotment evaluation procedures; therefore, wild horse numbers would increase exceeding established use levels, causing damage to vegetation, and resulting in not maintaining

a thriving natural ecological balance. Use above 55 percent of key species by March 31 will result in reduced forage production, reduced soil fertility, and lower the soils capacity to retain moisture.

Although allotment evaluations have not been completed for these areas, a review of monitoring data indicates that the current horse numbers are in excess of what would be an optimal number. Therefore, retaining current numbers and monitoring would not maintain a thriving natural ecological balance. There would be increased pressure for wild horses to move outside HMAs.

- Removal of the checkerboard lands from areas where wild horses would be maintained and managed would reduce or eliminate most conflicts, such as the consumption of private forage and water, on 107,500 acres of unfenced private lands.
- Combining the Cherry Creek Herd Area with the Antelope Valley and Maverick-Medicine HMAs will more accurately reflect the actual on-the-ground occupation and movement of wild horses and allow for more efficient planning, monitoring, and management of wild horses.

VI. COORDINATION, CONSISTENCY, AND PUBLIC PARTICIPATION

The determination to complete this amendment was made in December, 1991. A Notice of Intent was published in the <u>Federal Register</u> on January 27, 1992. This notice also included a scoping period during which the public was requested to assist the BLM in identifying planning issues, planning criteria, and identifying alternatives they wish to be analyzed in the amendment. A letter to all interest groups, individuals, and agencies was sent on February 6, 1992. A news release was prepared and sent to all newspapers in northern Nevada.

Agencies, Organizations, and Persons to Whom this Document was sent:

Congressional Delegation

US Senator Richard Bryan

US Senator Harry Reid

US Congressman James Bilbray

US Congressman Barbara Vucanovich

Federal Agencies

US Fish and Wildlife Service US Humane Society

State Agencies

Nevada State Department of Agriculture
Department of Conservation and
Natural Resources
Division of State Lands
Nevada State Clearinghouse
Nevada Department of Wildlife

Nevada Farm Bureau Federation

Native American Councils

ToMoak Band Western Shoshone (Lee, NV)

Local Government

Elko County Commissioners Elko County Planning Commission

Other Organizations

Alliance for Animals
American Bashkir Curley Register
American Horse Protection Association
American Humane Association
American Mustang and Burro
Association

American Mustang Association, Inc. Animal Protection Institute of America Barbara Eustis-Cross L.I.F.E. Foundation Commission for the Preservation of Wild Horses and Burros Fund for Animals H&R Livestock Holtz, Inc. Humane Society of Southern Nevada International Society for the Protection of Wild Horses and Burros (Reno, NV) International Society for the Protection of Wild Horses and Burros (Scottsdale, AZ) L.W. Peterson, Inc. Lincoln Land and Livestock National Mustang Association, Inc. National Wild Horse Association Nevada Cattlemen's Association Nevada Federation of Animal Protection Organizations Nevada Humane Society Nevada Land Action Association Nevada Land and Cattle Co. Nevada Outdoor Recreation Association Nevada Stockman Save the Mustangs Sierra Club (Reno, NV) The Nature Conservancy The Nevada Rancher Thousand Peaks Ranches, Inc. United States Wild Horse and Burro Foundation Western American Society Animal Science

Wild Horse Organized Assistance

Individuals

Deborah Allard Susie Askeu

Earl Bingham Family Demar Dahl William G. and Elizabeth A. Dickinson Craig C. Downer Steve Fulstone Clifton P. and Bertha Gardner Dave Hornbeck Blair Johns Ken Jones Charles R. Kippen and Sons Louise Lear et.al. Donald Molde, Dr. Bert Paris and Sons Mike Pontrelli Dean Rhoads C. Jean Richards Metta B. Richens Reed B. Robinson Deloyd Satterhwaite Alan Sharp Loyd Sorenson Von L. and Marian Sorenson Stowell Brothers Charles M. and John H. Young

Public Libraries

Elko County Library Wells Library West Wendover Branch Library

BLM Offices

Elko District Office 3900 East Idaho Street P.O. Box 831 Elko, Nevada 89801

Nevada State Office P.O. Box 12000 850 Harvard Way Reno, Nevada 89520

IV. LIST OF PREPARERS

This amendment was prepared by an interdisciplinary team of resource specialists from the Wells Resource Area, Elko District (see Table 8).

TABLE 8 LIST OF PREPARERS

NAME	TITLE	DISTRICT	
Bruce Portwood	District Wild Horse Specialist	Elko District	
Karl Scheetz	Supervisory Range Conservationist	Elko District	
Leticia Gallegos	Range Conservationist	Elko District	