



## COMMISSION FOR THE PRESERVATION OF WILD HORSES

255 W. Moana Lane Suite 207A Reno, Nevada 89509 (702) 688-2626

December 13,1995

Mr. Bill Baker Wells Resource Area Bureau of Land Management 3900 East Idaho Street P.O. Box 831 Elko, Nevada 89801

Subject: Utah/Nevada Permit

Dear Mr. Baker:

Thank you for letter addressing issues concerning the West Whitehorse and Utah/Nevada Allotments. Your notifications of management actions affecting livestock grazing permits provide opportunities to make necessary adjustments to achieve the land use plan goals or objectives. From our review of the notifications, it was not your intent make any adjustments or changes affecting livestock.

The Commission remains very concerned with the Wells Resource Area's implementation of the Well's Wild Horse RMP Amendment. As you are aware, protests to the 10 percent utilization limitation on key winter forage for wild horses must be contested as the District implements the amendment through land use planning. We view the renewal of grazing permits as management actions subject to the land use plan and regulations. Therefore, it is important to know if these allotments are within the delineated key areas that limit the Antelope Wild Horse Herd appropriate management level. In addition, it would appear appropriate to make changes or include additional terms or conditions to all new permits at this opportunity.

In the case of the Utah/Nevada Allotment, the new permit should establish or implement any limiting factors to livestock to be evaluated in pending allotment evaluations/multiple use decisions.

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This would implement the land use plan and provide the permittee or any affected interest with a clear understanding that grazing practices are not as adjudicated over 30 years ago. Since the Wells Resource Management Plan was implemented, additional data have been collected on this allotment, therefore it would be appropriate to comply with NEPA to comply with Bureau policy.

We would appreciate your attention on this matter.

Sincerely,

CATHERINE BARCOMB

Executive Director



## United States Department of the Interior

## BUREAU OF LAND MANAGEMENT

Elko District Office P.O. Box 831 Elko, Nevada 89803

> In Reply Refer To: 4130 (NV-015) JAN | 7 1996

Commission for the Preservation of Wild Horses 255 W. Moana Lane Suite 207A Reno, NV 89509

Dear Ms. Barcomb:

This letter is in response to your correspondence of December 13, 1995, concerning the proposed decision to issue a grazing permit to Sherie Rae Goring to use the Utah/Nevada South Allotment, based on a three year lease. We did not construe your letter to be an appeal of the proposed decision.

In response to your questions we submit the following: the Utah/Nevada South Allotment does fall within the Antelope Valley Herd Management Area combined winter use areas by wild horses and livestock as depicted on map 2 and 5 of the Proposed Wells Resource Management Plan Wild Horse Amendment and Environmental Assessment. Approximately 8% of the Antelope Valley Herd Management Area (HMA) falls within the Utah/Nevada South Allotment. The key area within the Utah/Nevada South Allotment is a key area where wild horse use would be limited to 10% use prior to livestock turnout. No utilization readings have been collected prior to livestock turnout because aerial census data and allotment inspections have shown only incidental use by wild horses beginning in 1983 with the exception of years 1985 and 1990.

The Bureau of Land Management is not proposing any adjustments or changes affecting livestock or wild horses at this time. Any appropriate changes and additional terms or conditions to new permits will be done through the allotment evaluation and multiple use decision process. The allotment evaluation for the Utah/Nevada South Allotment is scheduled to be completed in 1996/97.

If you have any further questions, please contact Kathy McKinstry or Bruce Thompson at the (702) 753-0200.

Sincerely yours,

BILL BAKER, Manager Wells Resource Area