



United States Department of the Interior

BUREAU OF LAND MANAGEMENT
ELKO DISTRICT OFFICE
3900 E. IDAHO STREET
P.O. BOX 831
ELKO, NEVADA 89801



IN REPLY REFER TO:
1742/4700 (NV-014)

AUG 19 1994

Dear Interested Party:

As you may be aware, several large wildfires have occurred on the Elko District this summer. The wildfire known as Mahogany Springs Fire occurred within the Rock Creek wild horse Herd Area (HA), burning approximately 8,014 acres. The intensity of this fire was quite high in the riparian zones where fuel loading was greatest, especially in the Winters Creek area. The pre-fire vegetation was predominantly big sagebrush-grass communities and where the fire intensity was moderate, the grasses should respond well if given rest from grazing. The bottomlands adjacent to the stream will need some seeding to maintain water quality and to prevent erosion of the adjacent uplands. Winters Creek is inhabited by redband trout, a category 2, Candidate species, therefore, water quality and restoration of riparian habitat are considered a high priority. Aspen stands that burned will also need to be rested from grazing to allow the regeneration to replace the former stands.

BLM resource specialists have examined the burned area and the proposal for an Emergency Fire Rehabilitation (EFR) plan includes the following:

1. Seed the riparian areas and adjacent uplands in the Winters Creek drainage to prevent erosion, maintain water quality, and restore redband trout habitat. Aerial seeding or broadcast seeding from an ATV would be the method of choice.
2. Defer grazing by livestock and wild horses for a minimum of two years to allow natural regeneration of the vegetation and to allow the riparian seeding to establish.
3. Effect the grazing deferment by constructing a fence to BLM specifications, that will enclose the burned area and tie into the existing allotment boundary fence.
4. Reduce livestock and wild horse numbers in proportion to the AUMs eliminated by the two year deferment. An emergency wild horse gather would be authorized to effect the wild horse reduction.

The rationale for the proposed EFR plan is as follows:

1. BLM policy is not to authorize actions that would contribute to the listing of Candidate species as either Threatened or Endangered. The presence of redband trout in the waters of Winters Creek requires that rehabilitation action be taken to maintain their presence. The combination of new succulent vegetation following seeding and regeneration and the presence of water in Winters Creek would result in livestock and wild horses concentrating in the riparian zone, especially during the hot season.

- after BLM
won't consult
thru NEPA on
fines

You hope the
VEA & GATHER
will address
Your Issues. —

Impacts to the vegetation that would regenerate naturally, as well as to the species seeded, would likely result in a degraded condition of the riparian zone.

2. Census data for the area indicates that approximately 70 wild horses maintain year round residence in the area impacted by the wildfire. The emergency gather would be based on removing only these animals from the HA. A removal was selected over the alternative of just displacing these 70 wild horses to the rest of the HA/allotment because: a) the AUMs were being reduced by the closure; b) there does not appear to be any migration of these wild horses, or any others, through the area between winter and summer; and c) without the removal and the construction of the fence, the wild horses would have to be continually herded to effect the deferment.
3. The presence of cheatgrass in the Elko District creates the potential for conversion of any burned area from a perennial grass-shrub community to one dominated by cheatgrass and other annuals. Whether a complete conversion, which has occurred in much of the area south of Midas, or only partial dominance, which has occurred in portions of the Rock Creek Allotment, the result is a reduction in forage quality, temporal reduction in availability of forage, and the increased potential for additional fires that can spread into previously unburned areas. The experience has been that without deferment following a fire, cheatgrass becomes a major component of the vegetation. This is an unacceptable alternative given the amount of acreage that has been converted to cheatgrass/annual communities in the past 30 years. The impacts from this type of vegetative conversion effect the wild horse populations as well as the livestock operator and wildlife populations.

The Rock Creek Allotment is currently being evaluated in the Allotment Evaluation process. Long term management goals for Wild horse numbers, livestock stocking rates, and grazing practices will be analyzed through that process. The actions proposed in the EFR plan are short term, generally for two years, but longer if monitoring indicates that additional deferment is needed. While the wildfire creates problems, it also creates opportunities. The fence proposed to effect deferment could also be used to facilitate grazing the area as a riparian pasture in the future. This possibility would be examined as one of the long term options in the allotment evaluation process.

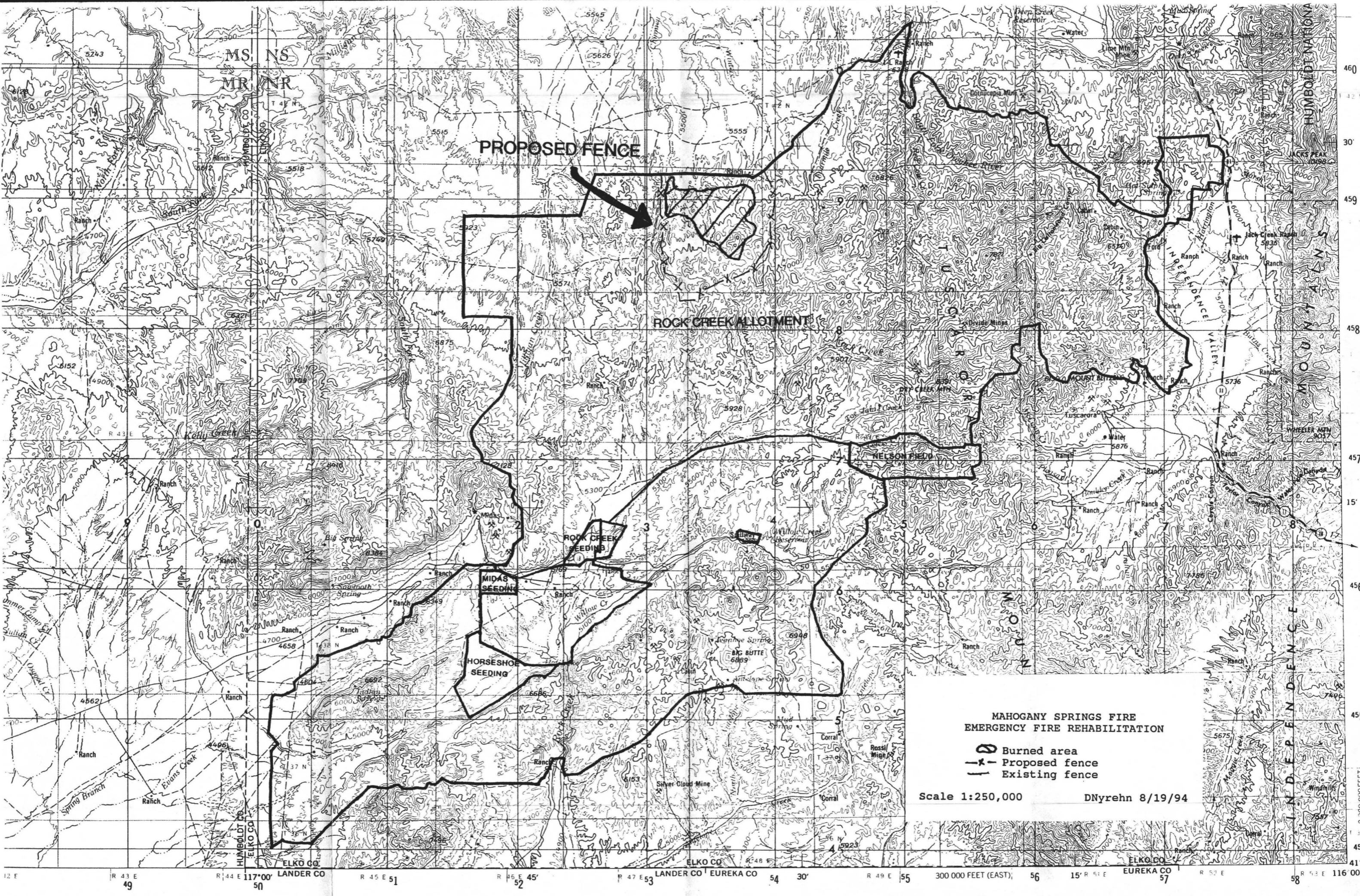
The objective of this letter is to inform you of the proposal, the rationale that went into developing the proposal, and to ask for your cooperation in achieving the EFR goals. If you have any questions, please contact me or Gary Back, the EFR team leader, at (702) 753-0200.

Sincerely yours,

Russell T. Dailey

RUSSELL T. DAILEY, Manager
Elko Resource Area

Enclosure: Map



PROPOSED FENCE

ROCK CREEK ALLOTMENT

ROCK CREEK SEEDING

MIDAS SEEDING

HORSESHOE SEEDING

NELSON FIELD

**MAHOGANY SPRINGS FIRE
EMERGENCY FIRE REHABILITATION**

- Burned area
- Proposed fence
- Existing fence

Scale 1:250,000

DNyrehn 8/19/94

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
ELKO DISTRICT

8/29/94
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ADMINISTRATIVE DETERMINATION OF NEPA COMPLIANCE

Documentation File (where original will be filed): _____

Name of Proposed Action: Mahogany Springs Emergency Fire Rehabilitation Plan (J034)

Applicant: BLM

EA/EIS in which the proposed action has been addressed: EA-NV-010- 9 2 - 0 6 0 or
BLM/EK/PL- /

Legal Description: T41N, R48E, secs. 1, 2, 5-27, 36; T41N, R49E secs. 6, 7, 8; see Maps 1 & 2

This action is in conformance with the ~~Wells~~/Elko RMP; Issue Livestock Mgt., Wildlife & Wild Horses,
Decision/Prescription (#)1&2; 1&4; 1&4, page (#)20; 29; 33.

Proposed Action Summary: Treatment #1 of the Normal Fire Rehabilitation Plan (NFRP), Natural Revegetation with Closure has been proposed for this fire rehabilitation. Approximately 20,801 acres would be closed to livestock and wild horse grazing for two growing seasons. Follow up management would include construction of 16.3 miles of fence to facilitate closure, an emergency wild horse gather/removal, and suspension of 2,555 AUMs within the proposed pasture. Approximately 40 acres will be seeded with sagebrush to replace cover around a sage grouse strutting ground. Monitoring as proposed in the Addendum to NFRP, Emergency Fire Rehabilitation Plan for Mahogany Spring Fire, would also be established.

(Specific stipulations/mitigating measures from the original EA may be attached on a separate sheet of paper.)

Check-off the following criteria (if not applicable, an EA/CX must be completed):

- 1. The proposed action is a feature of, or essentially the same as, the alternative selected and analyzed in the existing document.
- 2. A reasonable range of alternatives was analyzed in the existing document.
- 3. There has been no significant change in circumstances or significant new information germane to the proposed action.
- 4. The methodology/analytical approach previously used is appropriate for the proposed action.
- 5. The direct and indirect impacts of the proposed action are not significantly different than those identified in the existing document.
- 6. The proposed action would not change the previous analysis or cumulative impacts.
- 7. Public involvement in the previous analysis provides appropriate coverage for the proposed action.
- 8. Cultural inventory completed, and a "Negative Report", or a report with only isolates documented.

RMP Conformance and NEPA Compliance Review:

Gary N. Back
Preparer

EC Initials

Russell J. Danley 8/29/94
Area Manager (non-delegated actions only)

I have determined this action has been covered by a previous NEPA analysis and is in conformance with the land use plan. It is my decision to implement the action, as described, with the attached mitigation measures (if any).

Approved By:

Goodfrey Harris
Authorized Officer

8/29/94
Date

*District Manager's signature for non-delegated or District-wide actions, otherwise signed by the Area Manager

**Addendum to Normal Fire Rehabilitation Plan
Emergency Fire Rehabilitation Plan for Mahogany Spring Fire
EFR (J034)**

Site Specific Addendum for the Mahogany Spring Fire, J034.

1. Fire Statistics:

- a. Date: 07/17/94 - 07/21/94; Control 07/21/94
- b. Location: T. 41 N., R. 48 E., Sections 1, 2, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 20, 21, 22, 23, 24, 25, 26, 27, 36 and T.41 N., R. 49 E., Sections 6, 7, 8;
See Map 1 and 2.
- c. Intensity of fire: The burn intensity of approximately 30 percent of the burned area was light, most of which occurred on the western portion of the fire. Approximately 60 percent of the area burned moderately, and 10 percent burned extreme. Most of the extreme intensity occurred in the Winters Creek drainage, where fuel loading was high.
- d. Size: Total burn area was approximately 8,741 acres of which 6,731 acres were public lands administered by BLM, and 1,738 acres were private lands. Approximately 272 acres of the burned area were in undefined land status. Undefined land status, also called hiatus, are areas that are not included within a current land survey or are areas that are included within two different surveys. Final determination of actual status and ownership has not been made.
- e. Burned Area Report: The Burned Area Report (Form 1742-1) is attached for reference.
- f. NFRP treatment proposed: Treatment #1, Natural Revegetation with Closure, has been proposed for this fire rehabilitation. Follow up management would include construction of 16.3 miles of fence to facilitate closure, an emergency wild horse gather/removal, and suspension of 2,555 AUMs within the proposed pasture. Seeding of sagebrush on approximately 40 acres to replace cover around a sage grouse strutting ground is also proposed.

2. Affected Environment Statistics:

- a. Soils: Most of the soils in the burned area have a slight wind and water erosion hazard when disturbed. Locally there are areas where blowing soil is a problem and there are some areas that have a moderate to high water erosion hazard. The area with the most erosive soils is on the steep slopes on the west side of Winters Creek. Some sloughing and a small amount of headcutting has already occurred on these erosive soils in the northern part of the burn, along Winters Creek. Most of the potential for erosion exists on private land.

Numerous springs with associated riparian vegetation have the potential for severe soil compaction without rehabilitation treatment.

- b. **Water and Air Resources:** Two perennial streams, Winters and Threemile Creeks, are present on the burned area. Both originate from a series of springs, however, permanent water is limited on Threemile Creek. Winters Creek is perennial over most of its length, but flows are diverted for irrigation north of the burned area.

Approximately 45 springs occur in the burned area, some of which are public water reserves. Most of the springs are in good condition.

Air resources were temporarily affected during the burn period. After the fire was controlled, air resources have been impacted during periods of high winds when ash and/or soil have been blown off the site. Most of the soils were rated as having slight potential for wind erosion.

- c. **Vegetation:** Most of the area is big sagebrush-bunchgrass communities. The range sites present are generally Loamy 8-10" and Loamy 10-12" precipitation zone. There were also some mountain brush communities and aspen stands, primarily as minor inclusions. There are some low sagebrush-bunchgrass communities also present. Most of the burned area was in mid seral status. Table 1 shows the breakdown, by acreage, of the different range sites and the seral stage of each.

Riparian vegetation types occur at seeps and springs scattered throughout the upper elevations and along perennial stream courses. Common species include aspen, willows, Kentucky bluegrass, baltic rush, sedges, and a variety of forbs.

- d. **Threatened, Endangered or Candidate Species:** No Threatened or Endangered species are known to occur within the burned area. Winters Creek supports redband trout, a category 2, Candidate species. BLM constructed an enclosure on approximately 1/2 mile of Winters Creek in 1974 as part of an effort to improve habitat conditions for the redband trout. Improvement of the habitat has occurred, including stabilization of the streambanks, increased aspen regeneration, increased vegetation of the streambanks, and less fine sediments on the bottom substrates. Although the enclosure burned, the riparian vegetation inside the enclosure created a greenstrip buffer zone and remains essentially intact. This vegetation will continue functioning to filter runoff and protect the streambanks. Outside the enclosure, riparian vegetation was severely impacted by the fire and fish habitat will be impacted by the erosion.

Other Candidate species that occur or that are likely to occur on the area are loggerhead shrike and Pygmy rabbit.

- e. **Land Treatment:** The only range improvement affected by the burn was the Winters Creek enclosure (JDR# 4553). The wooden brace and fence posts of this enclosure were completely consumed by the fire. However, the land survey on which the location of this enclosure was based has been resurveyed and the enclosure area is now apparently private land. Accordingly, no effort will be expended to rebuild the enclosure on the existing site.

Table 1. Range site acreage and seral stage for the Mahogany Springs Fire.

Range Site	Acres by Seral Stage				
	Unclassified	Early	Mid	Late	Potential Natural Community
Loamy 8-10"			2,603		
Loamy bottom 8-14"				365	
Loamy 10-12"				1,531	
Claypan 10-12"				1,930	
Steep North Slope		25			
Claypan 12-16"				514	
Loamy slope 12-16"				404	
Chalky Knoll				452	
South Slope 8-12"			47		
Stony Mahogany Savanna			12		
Stony Bottom			7		
Mountain Ridge				87	
Wet Meadow			155		
Dry Meadow			93		
Aspen	41				
Rock outcrop	475				
TOTAL ACRES	516	25	2,917	5,283	0
% OF BURNED AREA	5.9 %	0.3 %	33.4 %	60.4 %	0 %

f. **Wildlife Species:** The Mahogany Springs Fire occurred within mule deer summer habitat, primarily within the vegetation between the 6,200 foot elevation to the upper portion at 7,200 feet. Fawning and fawn-rearing cover associated with riparian vegetation in creek drainages and mountain brush pockets were affected.

The entire burn occurred within pronghorn summer habitat.

The mule deer and pronghorn that inhabit the area are managed as part of Nevada Division of Wildlife-delineated Management Area 6, Unit 067.

A sage grouse strutting area was burned two miles south of the Winters Creek Ranch, located at T. 41 N., R. 48 E., sec. 13 NWNW. Sage grouse brood habitat associated with riparian and upland sites were burned.

The area is located in high density (30-50 birds per square mile) chukar partridge habitat. The burn affected

herbaceous plant species used for forage and shrub species that provided hiding, nesting and thermal cover.

The area has high value as raptor habitat. Golden eagles, prairie falcons, red-tailed hawks, northern harriers, and kestrels are some of the raptors that inhabited the burned area.

Overall, due to the habitat diversity allowed by rocky physiographic features, permanent water sources associated with perennial streams and spring sources, and large intact stands of perennial vegetation in the upland areas, the area has provided habitat for several nongame avian, reptilian and mammalian species. Nongame habitat would be affected for an undetermined period prior to plant reestablishment.

Winters Creek supports an abundance of native fish species. In addition to the redband trout, electroshocking studies during 1977 documented suckers, shiners, and dace (species not determined).

- g. Wild Horses: The Mahogany Springs Fire occurred within the Rock Creek Herd Area (HA) which encompasses approximately 182,000 acres of public and private lands. As of the August 1994 census flight, 725 horses resided in the HA. Seasonal census flights have shown that up to 145 wild horses (112 adults and 33 foals) may be residing in the vicinity of the burned area summer and winter. Heavy snowfalls force the resident wild horses out of the high country (which is the watershed boundary in the middle of the HA) in a northward direction to the lower elevations in and around the burned area. The indication from the census flights is that no other wild horses move through the burned area during seasonal migration within the HA.
- h. Wilderness Study Areas: No WSAs are found in or near the allotment.
- i. Grazing: The Mahogany Fire burned on the Spanish Ranch Allotment (part of the former Rock Creek Allotment). Although the former Rock Creek Allotment was officially split in 1988, there is no fence separating the two new allotments (Spanish Ranch and Squaw Valley).

The former Rock Creek Allotment was classified as "I" or "Improve" in the Elko Resource Area Rangeland Program Summary.

There are two grazing permittees on the Spanish Ranch and Squaw Valley Allotments: Nelo Mori and Ellison Ranching Company. Current permitted use for both permittees is provided in Table 2. Season of use has been March 25 to November 30.

Kind and Class of Livestock:

Cattle -- pairs, yearlings

Sheep

Horses -- Domestic horse use is confined to the Horseshoe Seeding and the southern portion of the Squaw Valley Allotment.

Table 2. Grazing preference for the Squaw Valley and Spanish Ranch Allotments.

GRAZING PREFERENCE			
	SQUAW VALLEY	SPANISH RANCH	FORMER ROCK CREEK
ACTIVE	26,796	22,201	48,997
SUSPENDED	11,279	8,398	19,677
TOTAL	38,075	30,599	68,674

Percent Public Land (by carrying capacity):

Spanish Ranch - Entire Allotment	74 %
Squaw Valley -- Native	81 %
Rock Creek Seeding	100 %
Horseshoe Seeding	100 %
Midas Seeding	85 %

The Spanish Ranch Allotment is 182,508 acres in size (public and private acres). Total estimated carrying capacity of the burned area is 1,388 AUMs, based on prorating AUMs to the burn area from the total active preference and public acres of the Spanish Ranch Allotment. Carrying capacity of the burned acres of public land is 1,069 AUMs. 1069

- j. Cultural Resources: A cultural inventory would be conducted before any surface disturbance would be initiated. Any significant cultural resources identified through the cultural inventory would result modification of the action to eliminate any impact.
- k. Visual Resources: The fire occurred in Visual Resources Management area designated as Class III. The area consists of moderately steep rolling hills with V-shaped drainages. Creeks and drainages contribute winding linear elements. Green vegetation is common near the many springs and seeps.
- l. Recreation: The area receives light to moderate use during the non-hunting seasons. Use increases during the gamebird, pronghorn antelope, and deer seasons. Moderate to heavy use occurs along the Scraper Springs road at the west edge of the burn.

3. Determination of Recovery Potential:

The tetrazolium (TZ) test was not conducted to determine the amount of live tissue in badly burned plants in the area as this chemical has been reported to be a carcinogen and no training on the safe handling of this chemical or the hazard potential has been received at the District. Visual examination of the burn area revealed that the fire intensity was moderate over the majority of the burn, with only 10 percent of the area rated as extreme intensity.

4. Proposed Treatment Statistics:

- a. Acres to be treated: Seeding - 40 acres public;
New pasture fence - 16.3 miles enclosing 20,801 acres.

- b. **Seed Mixtures:** Seeding will only be conducted in the vicinity of a sage grouse strutting ground to provide the loafing cover required to maintain active use of the strutting ground. Wyoming big sagebrush would be seeded.
- c. **Method of application:** Seed would be applied by a broadcast seeder mounted on an ATV.
- d. **Planned dates of treatment:** October 30, 1994.
- e. **Start date of deferment:** October 30, 1994.
- f. **Facilities needed for deferment:**

Approximately 16.3 miles of 3-wire fence (Map 2). This fence would create an area of approximately 20,801 acres that would be closed to livestock and wild horse grazing for at least two growing seasons. Land status within the pasture created by this fence is as follows:

public	16,081 acres;
private	3,869 acres;
undefined	845 acres.

The fence should be a 3-wire and built to District specifications.

The fence should be flagged, with ribbon flagging or white cloth flagging, for the first year to make it visible to wild horses.

- g. **Method of deferment:** Deferment of livestock grazing would be achieved by a grazing decision. An emergency gather/removal is proposed to remove approximately 112 "resident" adult wild horses from the proposed new pasture. Approximately 130 adult wild horses would need to be gathered from in and around the burned area to remove 112 adults (9 years old and under). Those over 9 years old would be released at watering sites elsewhere in the HA. Including foals, approximately 160 horses would be involved in the gather.
- h. **AUMs to be deferred (public land):** Under the proposed treatment, 2,555 AUMs within the new pasture would be deferred. Without construction of the fence, the entire existing pasture would be deferred, for a total of 35,871 AUMs.

5. Impacts:

- a. **Soils:** The proposed treatment would result in some soil losses prior to vegetation reestablishment, followed by a high degree of soil stabilization. The highly erosive soils in the Winters Creek area would suffer the greatest impacts from fall precipitation and spring runoff.

Without treatment, livestock and wild horses would be attracted to the burn area because of the highly palatable vegetation that would be available during the first few growing seasons. This would reduce the amount of vegetative recovery, especially in the riparian zones associated with the perennial streams and springs. The result would be increased soil losses and soil compaction in the heavily used areas.

- b. **Water and Air Resources:** The proposed treatment would result in some short term degradation of water quality. Fall precipitation and spring runoff would increase sediment loads in the perennial streams until vegetation becomes reestablished.

Without treatment, sedimentation would continue to be a problem due to the anticipated degradation of the riparian areas due to livestock and wild horse impacts. The result would be long term impacts to Winters Creek, which provides habitat for the redband trout (category 2, candidate species).

- c. **Vegetation:** The proposed treatment would provide for perennial grasses which survived the fire to resprout, produce seed, and establish new seedlings during the second year. The burned area should be in high early seral condition after two growing seasons. Where Thurber's needlegrass and bluebunch wheatgrass dominate the site, condition would be in high mid-seral to late seral. Shrub species, especially mountain big sagebrush at the higher elevations, should reproduce from seed in the soil or from invasion at the edges of the burn. Areas previously supporting Wyoming big sagebrush will require several years for shrub reestablishment. As sagebrush reestablishes, the condition should improve to at least mid-seral.

The range was in mid-seral condition prior to the wildfire. Vegetation was dominated by native perennials, with only small amounts of cheatgrass present. Some increase in cheatgrass is expected, but not to the degree that monocultures would be created.

Aspen stands readily resprout after fire if the heat did not penetrate deeply into the soil surface layer. Willows will also resprout and are likely to increase in abundance after the fire. Rest from grazing will enhance the recovery of these woody species. Mule deer will have some impact on the willow and aspen recovery.

Without treatment the vegetation should begin to recover, but heavy use by livestock and wild horses, attracted to the highly palatable regrowth, would inhibit the recovery of perennial grasses and forbs. This concentrated use would diminish root reserves for plants that resprout, inhibit establishment of new seedlings, and create an opportunity for annual vegetation to establish.

Vegetative communities would be expected to remain in early seral status. Loss of existing perennial communities and the existing seed source, combined with establishment of annual invader species would limit future opportunities to restore the native, perennial communities.

Impacts to willows, aspen, and other palatable shrub species will occur without treatment. The actively growing portions of these species become attractive to livestock and wild horses during mid- to late-summer when herbaceous vegetation cures. Continued use of these sprouts will eventually reduce plant vigor and make the plants less resistant to disease and less competitive with other shrubs and grasses.

- d. **Threatened, Endangered, or Candidate Species:** No Threatened or Endangered species are known to inhabit the area, so no impacts are anticipated. Erosion and sedimentation of Winters Creek will occur until vegetation is adequately reestablished, therefore, some habitat degradation for redband trout is expected even with treatment. The degree of damage is dependent on storm intensity and duration, and on the amount of snowpack and speed of spring runoff. Rest from grazing will provide for reestablishment and growth of streamside vegetation, resulting in the narrowing and deepening of the stream channel. The changes in channel morphology and the increased vegetative cover should reduce summer water temperatures, maintain bottom substrates free of sediment, create quality pool habitat, and provide both instream and overhanging bank cover.

Impacts to loggerhead shrike and Pygmy rabbit will occur until shrub cover has reestablished sufficiently to provide cover for these species.

- e. **Land Treatment:** The enclosure on Winters Creek will not be repaired due to the change in land status following the most recent cadastral survey.
- f. **Wildlife Species:** The proposed treatment will enhance the recovery of mule deer summer habitat by allowing the aspen, willows, and mountain shrubs to reestablish.

The fire and the proposed treatment should enhance the habitat condition for pronghorn antelope by reducing shrub height and increasing abundance of grasses and forbs. As shrubs slowly reestablish and improve conditions for mule deer, conditions for antelope will begin to decline.

Impacts to sage grouse habitat are likely to last for 5 to 15 years. No activity is expected at the strutting ground until the big sagebrush cover around the strutting ground is reestablished; the seeding should enhance the rate of recovery. Use of riparian area by broods will occur when shrub cover on the uplands establishes to provide escape and loafing cover. On the lower elevation sites, this could require 15 years or more.

As with sage grouse, chukar populations are correlated with the return of cover and forage. In areas with sufficient boulders to provide escape cover, the grasses will provide the forage. In areas without boulder escape cover, chukar are likely to be absent until the shrub cover reestablishes.

Impacts to raptors are anticipated to be minimal. Those species that nest on cliffs or on the ground should not be impacted. The species that nest in aspen will experience a long term shortage of nesting habitat. Changes in prey species and abundance are likely to correspond to the changes in vegetation as the shrubs reestablish within the grassland created by the fire.

The reestablishment of the riparian habitat on Winters Creek will result in improved habitat conditions for native fish species.

Without treatment, the impacts to the wildlife species will

extend over a greater period of time. Aspen and other shrub species will take longer to recover, riparian habitat is not likely to recover, and annual species will displace some forage species.

- g. **Wild Horses:** The proposed treatment will remove approximately 145 wild horses (112 adults and 33 foals) from the pasture to be created by the new fence. These horses would be removed, not displaced. Displacement would increase utilization outside of the new pasture, so both horse and livestock numbers are to be reduced. The 145 horses targeted for removal tend to be resident animals, maintaining use on the area throughout the year. Other horses in the HA apparently do not migrate into or through the area.

The fence would be built to BLM specifications, including the recommendations for fences in HAs as given in the draft BLM 4700 Manual, part 4710.53 which states:

Fences and cattleguards in a herd area will be constructed with particular attention given to location, design, and compatibility with wild horse and burro management. Allotment boundary, drift, or highway fences which may interrupt migration routes, particularly during adverse weather, trap or cripple wild horses, or concentrate livestock use on important wild horse habitat, are to be avoided.

The location of the proposed fence should not impede movements of the horses which remain after the removal. Census flights indicate that no east-west migration occurs in this area. The horses demonstrate a strong elevational movement pattern between seasons. For this area, the movement would be from summer use areas at the high elevations in the southern portion of the new pasture to winter use areas in the lower elevations at the northern portion of the new pasture. The fence is proposed for the watershed boundary on the south and the existing allotment boundary fence will be used for the north boundary of the new pasture. By removing only the resident horses and deferring livestock use, the burned area should get complete rest from livestock and wild horse grazing. The fence should not interfere with movement of any of the other wild horses in the HA as no east-west movement has been documented and the north-south movements were limited to the horses targeted for removal.

The actions proposed are short term, generally for two years, but longer if monitoring indicates that additional deferment is needed. The permanency of the pasture or how it would be used in the grazing/wild horse management will be determined through the allotment evaluation process.

Without treatment, the wild horses could not be effectively kept from the burned area. Riding and/or herding, which are potential methods for deferring domestic livestock, are not legal methods for deferring wild horse use; they would constitute harassment of wild horses. If wild horses are not removed, forage on the burned area during this coming winter will be insufficient to support all the animals. Some would leave the area, resulting in social conflicts as

they attempt to establish new territories or join other wild horse groups. Those that remain on and around the burned area would focus on the highly palatable new growth in the spring and reduce the probability of the area returning to a plant community dominated by perennials. Without treatment, the objectives of the fire rehabilitation plan could not be achieved.

- h. **Wilderness Study Areas:** No impacts to WSAs are anticipated due to the proposed treatment.
- i. **Grazing:** The proposed treatment would result in 2,555 AUMs being suspended from at least March 25, 1995 through August 31, 1996. These AUMs could be suspended for a longer period if monitoring indicates that more time is necessary for the establishment of perennial vegetation. The new fence would increase maintenance costs to the livestock permittees over the current situation.

The actions proposed are short term, generally for two years, but longer if monitoring indicates that additional deferment is needed. The permanency of the pasture or how it would be used in the grazing/wild horse management will be determined through the allotment evaluation process.

- j. **Cultural resources:** The treatments should not have any impact on cultural resources. A cultural inventory would be completed to identify any cultural resources before the new fence is approved for construction. Discovery of cultural resources would result in modification of design or location of the project to avoid any eligible sites.
- k. **Visual Resources:** The proposed fence would introduce a straight linear features into the landscape. Visual contrasts (color and texture) between grazed and ungrazed (deferred area) would occur until the pasture is open to grazing and until the shrubs reestablish. In the long term, after grazing and shrub reestablishment occurs, the Class III VRM objectives would be met.
- l. **Recreation:** Initially, some reduction in dispersed recreation is anticipated as wildlife populations, especially sage grouse, decline. Pronghorn antelope should respond to the changes in habitat resulting from the fire and increased hunter days are anticipated within a few years.

6. Consultation:

- a. **List of Preparers**

- EFR Team

Gary Back	Team Leader
Donna Nyrehn	Range; Resource Advisor
Carol Marchio	Soils and Watershed
Carol Evans	Fisheries
Ken Wilkinson	Wildlife
Kathy McKinstry	Wild Horses
Stan Kemmerer	Operations Range Improvements
Bob Means	Fire Management

BLM specialists

Ken Nelson
Frank Dietz
Evelyn Treiman

Lands
Archeology
Visual Resources, Recreation,
Wilderness
Wild Horses (Nevada State
Office)

Tom Pagochik

b. Individuals, Groups, and Agencies

Ken Gray
Deloyd Satterthwaite

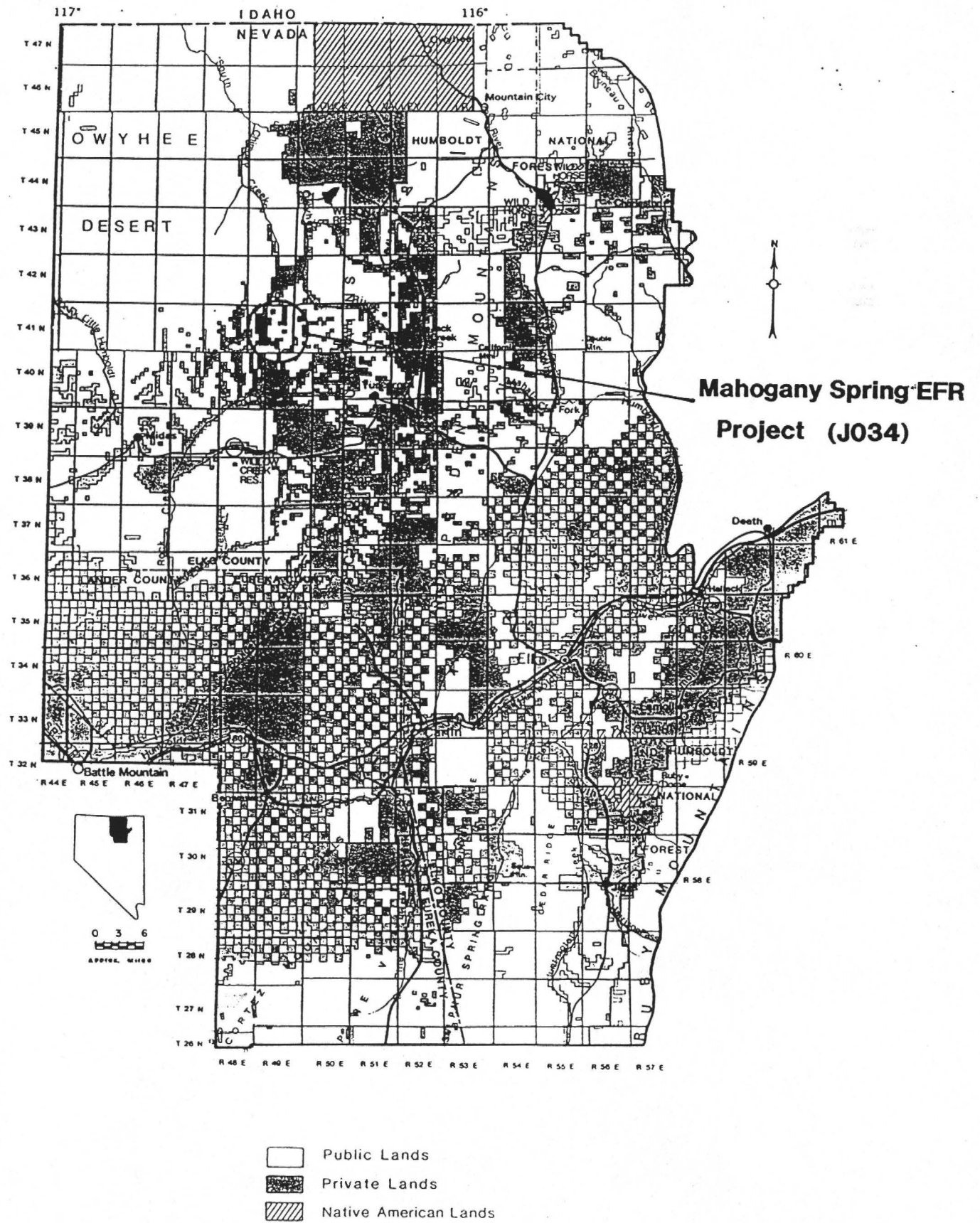
Nevada Department of Wildlife
Permittee, Rock Creek
Allotment

American Horse Protection Association
Animal Protection Institute of America
CPWH & B
Susan Alden
Ann Earl
Craig Downer
E.B. Robinson, Jr.
Fund for Animals
National Mustang Association, Inc.
National Wild Horse Association
Nevada Humane Society
Nevada State Department
International Society for Protection of Mustangs and
Burros
Resource Concepts, Inc.
Anna Charlton
Save the Mustangs
HSUS
Wild Horse Organized Assistance
American Mustang and Burro Association
Nevada Farm Bureau Federation
Nevada Outdoor Recreation Association
Sierra Club
Bobbie Royle
Rick Sorenson
Thomas Atkinson
Donald Molde
Nevada Cattlemen's Association
US Fish & Wildlife Service
Steven Fulstone
Susie Askeu
American Mustang Association, Inc.
Dave Hornbeck
Mike Pontrelli
Alliance for Animals
Division of State Lands; Land Use Planning
Jan Nachlinger
Robert Smith
Cindra Smith
WESTEC
Harry Wilson

7. Monitoring:

Monitoring studies will be established using standard BLM techniques of weight estimate and frequency to provide percent composition. Photo plots will be established to document changes over time. Once grazing has been resumed, utilization will also be determined.

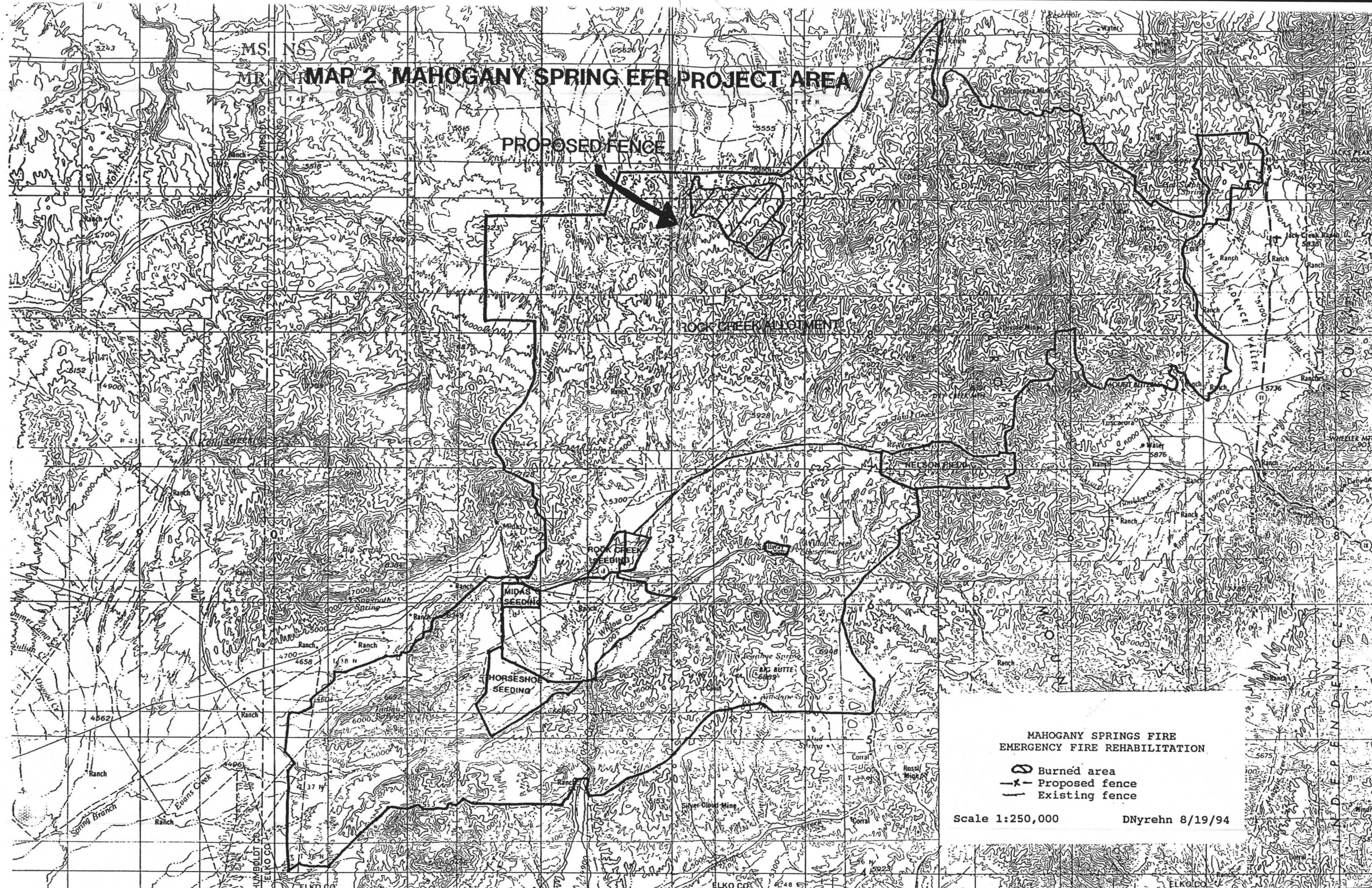
To ensure that horses do not become trapped within the enclosure or are prevented from using traditional migration routes, monitoring by ground and air would have to be increased for the first year of the project. A helicopter flight used in conjunction with the seasonal census flights would determine if problems existed. At a minimum, three flights per year would be necessary.






MAP 1. GENERAL VICINITY MAP - ELKO RESOURCE AREA

MS. N5
 MR. N4
MAP 2 MAHOGANY SPRING EFR PROJECT AREA

PROPOSED FENCE



**MAHOGANY SPRING FIRE
 EMERGENCY FIRE REHABILITATION**

-  Burned area
-  Proposed fence
-  Existing fence

Scale 1:250,000

DNyrehn 8/19/94

Form 1742-1
June 1986
(formerly 7441-1)

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

Date funding approved in WO

Date of report

08-21-94

BURNED AREA REPORT

SECTION A - IDENTIFICATION

1. Fire name and Number (see Form DI 1201) Mahogany Springs Fire (J034)		2. Effected State (<u>N</u> <u>V</u>)		3. County Elko (0 0 7) (- - -)	
4. Administrating State (<u>N</u> <u>V</u>)		5. Congressional District Second (0 2) (- -)		6. District Elko (0 1) (- -)	
7. DATE			8. Estimated suppression cost		
Started 7-17-94		Controlled 7-21-94		\$ 100,000	
9. Fire suppression damages repaired with 4620 funds					
Firelines waterbarred (miles) 0			Firelines seeded (acres) 0		
10. Fuel type fire intensity (nearest 10 percent) <input checked="" type="checkbox"/> Light 30% , <input checked="" type="checkbox"/> Moderate 60% , <input checked="" type="checkbox"/> Extreme 10%					

SECTION B - PROBLEM INVENTORY

1. Watershed (number) 17050105		2. Public acres burned 6,731		3. Water repellent soil area burned (percent) 2%	
4. Specify vegetation subtypes (nearest 10 percent) Wyoming big sagebrush-bluebunch 40%; Aspen 10%; low sage-Sandberg bluegrass 20%; Mountain big sagebrush-bluebunch-needlegrass 30%					
5. Geologic types Tuff, basalt, and Andesite lava flows					
6. Soil surface factor 41		7. Erosion potential 0.9 af/sq.mi./yr. cu-yds./sq.mi.		8. Storm peak potential 6 hr. 2 yr. 41 cu.ft./sec./sq.mi. (6hr. 10 yr. - 90.6)	
9. Stream channels by order or classes (miles) 6.7 miles perennial; 23.8 miles ephemeral			10. Public land roads (miles) (#1325) 4.5 miles		

SECTION C - CLIMATIC DATA

1. Annual precipitation (inches) 9-14"		2. Design storm rainfall during 6 hour period 0.9 inches 2 yr. frequency 1.2 inches 10 yr. frequency			
3. Annual runoff (nearest 10th) 3 inches		4. Maximum 30 minute intensity storm 0.39 inches 2 yr. frequency 0.70 inches 10 yr. frequency			

SECTION D - SUMMARY OF SURVEY AND ANALYSIS

1. Skills represented on team (check appropriate blocks) <input checked="" type="checkbox"/> Hydrology <input checked="" type="checkbox"/> Soils <input type="checkbox"/> Geology <input checked="" type="checkbox"/> Range <input type="checkbox"/> Timber <input checked="" type="checkbox"/> Wildlife <input checked="" type="checkbox"/> Fire management <input type="checkbox"/> Engineering <input checked="" type="checkbox"/> Contracting <input type="checkbox"/> Local management <input type="checkbox"/> Research <input checked="" type="checkbox"/> Other					
2. Emergency (describe) Erosion potential for Winters Creek; soil and watershed protection; redband trout (category 2 candidate species) present. Mule deer summer habitat, pronghorn summer habitat, sage grouse strutting ground present.					
3. Emergency rehabilitation objectives (see BLM Manual Section H-1742-1) Provide rest to allow perennial grasses, shrubs, & aspen to regenerate. Restore loafing cover near impacted strutting ground. Stabilize soils and streambanks.					
. Probability of completing treatment prior to first major damage-producing storm (nearest 10 percent) <input checked="" type="checkbox"/> Land 50% , <input checked="" type="checkbox"/> Channel 50% , <input type="checkbox"/> Roads , <input type="checkbox"/> Other					
5. Net non-market quality benefit index 1.0 <input type="checkbox"/> Significant <input checked="" type="checkbox"/> Not significant			6. Net social wellbeing benefit index 1.8 <input checked="" type="checkbox"/> Significant <input type="checkbox"/> Not significant		
7. B/C Ratio 1.0/1		7a. Net Benefits (B-C) 2,574		8. Cost effectiveness index (check one) <input type="checkbox"/> I <input type="checkbox"/> II <input type="checkbox"/> III <input type="checkbox"/> IV	

SECTION E - ON-SITE AND OFF-SITE DEVELOPMENTS

DEVELOPMENTS	UNITS (Number)	ESTIMATED VALUE (Dollars)
Community and urban development (people)		\$
Municipal and domestic water supply (people served)		
Transportation systems (miles)		
Water distribution systems (irrigation) (miles)		
Agricultural development (crops, facilities) (acres)		
Industrial development (dams, power, manufacturing) (number)		
Power and communication lines (miles)		
Recreation development (PAOT)		
Fish habitat Redband trout (category 2, candidate species)	6.7 miles	
Other (specify)		
TOTAL HAZARD POTENTIAL		\$

SECTION F - EMERGENCY REHABILITATION NEEDS

LAND OWNERSHIP	ACRES BURNED	LAND (Acres)	REHABILITATION		OTHER (Units)
			MILES		
			CHANNEL	ROAD	
FEDERAL					
Public lands	6,731	6,731			
Other (Name)					
SUBTOTAL					
	6,731	6,731			
NON-FEDERAL					
State and County					
Private	1,738	1,738			
Indian					
Other Hiatus	272	272			
SUBTOTAL					
	2,010	2,010			
TOTAL					
	8,741	8,741			

SECTION G - ELIGIBLE EMERGENCY REHABILITATION MEASURES
OR TREATMENTS AND SOURCE OF FUNDS

TREATMENT (1)	UNITS (2)	UNIT COST (3)	PUBLIC LANDS			OTHER LANDS		TOTAL
			NUMBER OF UNITS (4)	4630 DOLLARS (5)	OTHER DOLLARS (Name) (6)	NUMBER OF UNITS (7)	NON-FED. DOLLARS (Name) (8)	DOLLARS ALL LAND (9)
Seeding	acres	6	40	\$ 240	\$		\$	240
Fence	miles	4,500	16.3	73,350				73,350
Emergency wild horse gather/removal	ea	220	150	33,000				33,000
Wild horse herding	hrs.	450	5	2,250				2,250
Wild horse monitoring	hrs.	350	15	5,250				5,250
CHANNELS (Miles)								
Opening water course								
Stabilizing streambanks								
ROADS (Miles)								
Ditch cleaning								
Maintenance								
Cattleguard	ea	3,000	1	3,000				3,000
Cultural Inventory	WM	3,300	1	3,300				3,300
Planning, JDRs, etc.	WM	3,300	4	13,200				13,200
MAJOR STRUCTURES (Each)								
TOTAL				\$ 133,590	\$		\$	\$ 133,590

SECTION H - EXAMINING IMPACTS OF MANAGEMENT ALTERNATIVES
FOR AN EMERGENCY PROGRAM

Economic benefits summary with interest rate (percent)

ECONOMIC CRITERIA	UNITS OF MEASURE	WITHOUT TREATMENT		WITH TREATMENT		DIFFERENCE IN PRESENT VALUE
		NUMBER OF UNITS	PRESENT VALUE	NUMBER OF UNITS	PRESENT VALUE	
Sedimentation Impacts Downstream storage			\$		\$	\$
Sediment removal						
Fish habitat						
Water quality						
Flood Water Damage Land						
Property						
Other						
DOLLARS			\$		\$	\$

SECTION I - QUALITATIVE BENEFIT INDEX

NON-MARKET VALUE CRITERIA	WEIGHT FACTOR	WITHOUT TREATMENT		WITH TREATMENT		DIFFERENCE	
		ACTUAL	WEIGHTED	ACTUAL	WEIGHTED	ACTUAL	WEIGHTED
Erosion and sediment	10	2	20	1	10	1	10
Aesthetic land quality	2	2	4	1	2	1	2
Water quality	8	2	16	1	8	1	8
Ecological benefits	10	2	20	1	10	1	10
Fish and wildlife habitat	10	2	20	1	10	1	10
Other							
TOTAL	40		80		40		40
Average weighted index			2		1		1
Net non-market benefit index							1

SECTION J - SOCIAL WELLBEING BENEFIT INDEX

SOCIAL CRITERIA	WEIGHT FACTOR	WITHOUT TREATMENT		WITH TREATMENT		DIFFERENCE	
		ACTUAL	WEIGHTED	ACTUAL	WEIGHTED	ACTUAL	WEIGHTED
Life, health, safety							
Employment							
Recreational opportunity	3	3	9	1	3	2	6
Economic stability	1	2	2	1	1	1	1
Income distribution	1	2	2	1	1	1	1
Preserve special sites	5	3	15	1	2	2	10
Other							
TOTAL	10		28		10		18
Average weighted index			2.8		1.0		1.8
Net social wellbeing benefit index							1.8

District Manager (Signature)

Spokane

Date

8/29/94

State Director (Signature)

Date

PAGE ONE

INVESTMENT ANALYSIS MODEL DETAILED RESULTS

DATE: 8/28/94
TIME: 13:31

STATE: NV
OFFICE: 014

ALLOT./MGT. NO.: 01034
ALLOT./MGT. NAME: MAHOGANY SPRINGS EFR

VER.ID: 5
BASE YEAR: 1993

EXISTING PROGRAM COST DATA

STRUCTURAL
PROJECTS

UNITS TOTAL ANNUAL MAINT. COST

NONSTRUCTURAL
PROJECTS

UNITS TOTAL
REPLACEMENT
COST %BLM

EXISTING PROGRAM BENEFIT DATA

ANNUAL OUTPUTS *****	BASE LEVEL	FIRST LEVEL		SECOND LEVEL		THIRD LEVEL		FOURTH LEVEL	
		UNITS	YR	UNITS	YR	UNITS	YR	UNITS	YR
LIVESTOCK	AUM 2555	1486	1	1550	2	1700	3	2000	4
DEER	HDS 400	100	1	100	2	100	3	425	10
ANTELOPE	HDS 40	10	1	15	2	25	3	45	6
WPLAND/SM GAME	HDS 75	20	1	30	2	40	3	75	10
DISPERSE USE	RDS 150	75	1	75	2	75	3	100	4
SOIL RETENTION \$'S	-2740	-49250	1	-35850	2	-19450	3	-6000	4

10% OF LIVESTOCK AUMS ARE AVAILABLE BETWEEN 4/15 & 10/30 AT THE FINAL LEVEL

STATE: NV
OFFICE: 014

ALLOT./MGT. NO.: 01034
ALLOT./MGT. NAME: MAHOGANY SPRINGS EFR

VER.ID: 5
BASE YEAR: 1993

ALTERNATIVE PROGRAM COST DATA

STRUCTURAL PROJECTS *****	NEW UNITS	CONSTRUCTION COSTS BY YEAR					MAINTENANCE					
		--1--	--2--	--3--	--4--	--5--	%BLM	YR	%	REPLACEMT	BEG ANN	
FENCES	16.3MI.	73350	0	0	0	0	100	1	500	0	50	73350
ATTLEGUARDS	1.0NO.	3000	0	0	0	0	100	5	50100	50	3000	

NONSTRUCTURAL PROJECTS *****	NEW UNITS	CONSTRUCTION COST BY YEAR					REPLACEMENT			
		--1--	--2--	--3--	--4--	--5--	%BLM	LIFE	COST	%BLM
CORSE REMOVA	150 NO	33000	0	0	0	0	100	0	0	0
HERD/MONITOR	20 HR	7500	0	0	0	0	0	0	0	0

MANAGEMENT COSTS:	- - - -INITIAL- - - -		- - - -ANNUAL- - - -		
COOPERATOR		0 DAYS - \$	0	5 DAYS - \$	297
BLM		50 DAYS - \$	6855	5 DAYS - \$	685

ALTERNATIVE PROGRAM BENEFIT DATA

ANNUAL OUTPUTS *****	BASE LEVEL	FIRST LEVEL		SECOND LEVEL		THIRD LEVEL		FOURTH LEVEL		
		UNITS	YR	UNITS	YR	UNITS	YR	UNITS	YR	
LIVESTOCK	AUM	2555	1486	1	1800	2	2200	3	2700	4
DEER	HDS	400	100	1	100	2	100	3	450	10
A' OPE	HDS	40	410	1	15	2	25	3	30	4
U. D/SM GAME	HDS	75	20	1	30	2	45	3	85	10
DISPERSE USE	RDS	150	75	1	80	2	90	3	120	4
SOIL RETENTION	\$'S	-2740	-49250	1	-30000	2	-12000	3	-2500	4

00% OF LIVESTOCK AUMS ARE AVAILABLE BETWEEN 4/15 & 5/15 AT THE FINAL LEVEL

AGE THREE

INVESTMENT ANALYSIS MODEL DETAILED RESULTS

DATE: 8/28/94
TIME: 13:31

STATE: NV
OFFICE: 014

ALLOT./MGT. NO.: 01034
ALLOT./MGT. NAME: MAHOGANY SPRINGS EFR

VER.ID: 5
BASE YEAR: 1993

ANNUAL YIELD, UNIT VALUES, AND PRESENT VALUES (8.250%)

OUTPUT CATEGORY	UNIT	BASE YIELD	SUSTAINED YIELD		UNIT VALUES	PRESENT VALUE OF CHANGE
			W/O	WITH		
IVESTOCK FORAGE(AVERAGE)	AUM	0	0	0	9.41	0
IVESTOCK FORAGE(SEASONAL)	AUM	1486	2000	2700	9.41	67145
EER HUNTING	HDS	100	425	450	29.91	5533
LK HUNTING	HDS	0	0	0	87.92	0
NTELOPE HUNTING	HDS	10	45	30	50.83	12395
THER BIG GAME HUNTING	HDS	0	0	0	45.08	0
ATERFOWL HUNTING	HDS	0	0	0	45.08	0
PLAND & SMALL GAME	HDS	20	75	85	45.08	3948
ARM WATER ANGLING	ADS	0	0	0	39.11	0
OLD WATER ANGLING	ADS	0	0	0	39.11	0
EVELOPED SITE RECREATION	RDS	0	0	0	11.85	0
ISPERSED USE RECREATION	RDS	75	100	120	11.85	2402
ILDLIFE VIEWING/PHOTOG	RDS	0	0	0	36.23	0
RAPPING	RDS	0	0	0	0.00	0
OIL AND WATER	\$'S	0	0	0	1.00	0
OIL RETENTION	\$'S	-49250	-6000	-2500	1.00	43505
ILT REDUCTION	\$'S	0	0	0	1.00	0
LOOD DAMAGE	\$'S	0	0	0	1.00	0

STATE: NV
OFFICE: 014

ALLOT./MGT. NO.: 01034
ALLOT./MGT. NAME: MAHOGANY SPRINGS EFR

VER.ID: 5
BASE YEAR: 1993

EFFICIENCY TEST RESULTS

- - -EFFICIENCY RATIOS- - -			- - - - - DISCOUNTED VALUES - - - - -				
DISCOUNT	BENEFIT/	BENEFIT/	PRESENT NET	TOTAL	- - - - - COST - - - - -		
RATE	ALL COST	BLM COST	VALUE(B-C)	BENEFIT	TOTAL	BLM	OTHERS
8.250%	1.0 / 1	1.2 / 1	2574	134922	132348	116679	15669

INTERNAL RATE OF RETURN

50-YEAR UNDISCOUNTED EXPENDITURES

TOTAL COST
8.5%

	BLM	OTHER	TOTAL
EXPENDITURES:	226843	46553	273396
COST/ADD AUM:	6.74	1.38	8.12

BLM BUDGET COSTS FOR FIRST FIVE YEARS

YEAR	NEW FACILITIES & MANAGEMENT				EXISTING FACILITIES		TOTAL COST
	CONST.	O. & M.	MGT.	TOTAL	O. & M.	REPLCMT.	
1	109350	0	6855	116205	0	0	116205
2	0	0	685	685	0	0	685
3	0	0	685	685	0	0	685
4	0	0	685	685	0	0	685
5	0	0	685	685	0	0	685
TOTAL	109350	0	9595	118945	0	0	118945

- - - COSTS TO OTHERS - - -

PRODUCTION TOT.:	7500
AVERAGE ANNUAL COST-	-
OPER.&MAINTENANCE:	490
ANNUALIZED REPLMT:	0
LIVESTOCK MANGMNT:	291
TOTAL ANNUAL COST:	781

(NOTE: ROW AND COLUMN TOTALS MAY NOT SUM CORRECTLY DUE TO ROUNDING.)

DATA PREPARED BY: , RANGE CONS. G. BACK , WILDLIFE BIOL.

END OF DETAILED PRINTOUT



faxed 9/21

COMMISSION FOR THE
PRESERVATION OF WILD HORSES

255 W. Moana Lane

Suite 207A

September 21 1994
Reno, Nevada 89309

(702) 688-2626

Mr. Russell T. Daily
Elko Resource Area
Bureau of Land Management
3900 East Idaho Street
P.O. Box 831
Elko, Nevada 89801

Subject: Mahogany Springs Fire

Dear Mr. Daily:

The Nevada Commission for the Preservation of Wild Horses thanks you for consulting our agency concerning the emergency fire rehabilitation plan for the Mahogany Springs Fire. We assume that the consultation is directed to the scoping of issues for all necessary NEPA Documents. We would like to provide you with issues and concerns for the proposed action affecting wild horses:

* List of specific vegetation rehabilitation objectives limiting livestock and wild horse use of the fire area.

* Specific monitoring plan and schedule to evaluate monitoring data for re-authorization of grazing.

* Wild horse distribution, composition and population estimate data used to determine the impact to the herd.

* Assessment of the direct and indirect impacts of restructuring the herd by implementation of the Strategic Plan.

* Assessment of population data to determine the productivity and genetic viability of the remaining herd.

* The established Appropriate Management Level for the Herd Area to determine if the carrying capacity is available in the balance of the HA to support the 70 animals that you are proposing be removed.

Mr. Russell Dailey
September 21, 1994
Page 2

We look forward to reviewing the environmental assessments necessary to implement to proposed actions. Again, we appreciate your consultation prior to any action that may affect wild horses.

Sincerely,

A handwritten signature in cursive script that reads "Catherine Barcomb". The signature is written in dark ink and is positioned above the typed name.

Catherine Barcomb
Executive Director

7/21/94

ELLISON RANCHING COMPANY

Ranches Located in Elko, Humboldt and Lander Counties, Nevada

SPANISH RANCH -:- TUSCARORA, NEVADA 89834

(702) 756-6542

FAX (702) 756-6570

July 21, 1994

Mr. Rod Harris
District Manager, Elko District
Elko, Nevada

Dear Rod:

This letter is in regards to the wild horse population now found on the Rock Creek Allotment-(Now known as the Squaw Valley and Spanish Ranch Allotments).

Ellison Ranching Co. has been very patient in the past few years hoping that the BLM would realize the problem and take action to help resolve this over population. However, action on your part has never happened. Now as you well know, the wild horse population is at 733 or more, according to this 1994 Spring count.

The number of horses that should be there is 119. I know that this number can be argued forever but never the less the count of 733 is just out of hand. The BLM utilization studies indicate total horse use on the lower horse management area, and as you would expect, the country is starting to suffer from that constant use. All cattle and wildlife have left that lower area.

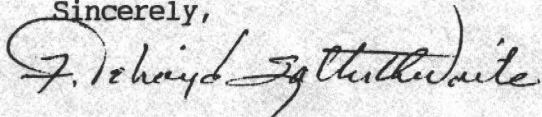
In this horse management area Ellison Ranching Co. owns a considerable amount of private land and also the majority of all the water. Please take this into consideration and also the fact that now due to the large horse numbers they are moving out of their designated area. This also cannot be accepted by us.

Also Rod, the Mahogany Springs fire just burned 10,000 acres that was in that horse management area which will force the horses even more out of their area.

I would suggest that with all of the facts I just mentioned, plus the drought that we're in, that some type of emergency removal could be conducted. We, Ellison Ranching Co., and the Rock Creek Allotment can and will support a reasonable number of horses but 733 is just out of reason for all parties concerned.

Your prompt attention in this matter would be appreciated.

Sincerely,



Ellison Ranching Co.
by F. Deloyd Satterthwaite