



COMMISSION FOR THE
PRESERVATION OF WILD HORSES

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August 17, 1994

Reno, Nevada 89509

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Mr. Dennis W. Martin
Inyo National Forest
873 North Main Street
Bishop, California 93514-2494

Subject: Inyo Standards and Guidelines

Dear Mr. Martin:

Thank you for recognizing the issues and concerns of the Commission concerning your recent Monitoring and Evaluation Report. It is important present meaningful data and establish the status of the wild horse herds on the Inyo Forest. We would appreciate an opportunity to contribute to the next report.

Standards and Guidelines are basic elements to all Forest Plans in Nevada. Grazing Reform will require Nevada to establish statewide standards. Ecosystem management will require all federal agencies to be apply common standards through each ecosystem. To this end, it is essential that your Forest Plan amendment be consistent with those standards and guidelines being applied in Nevada.

Currently, wild horse populations are being managed to meet allowable use levels of key riparian vegetation. Utilization limits or allowable use is being measured by percent use of annual growth. Often these utilization limits are described as "stubble height" that can be easily measured and understood by all parties. For example, stubble height objectives of four to seven inches for wet meadows equate to 50 percent utilization on other Forests.

According to the proposed matrices, utilization standards are expressed as percent by weight for grasses and sedges. It is our understanding, that many grasses retain as much as 50 percent of their total weight in the root system. Nevada Agricultural Extension agents have demonstrated that a two inch stubble height will equate to only 30 percent use by weight.

BOB MILLER
Governor

STATE OF NEVADA

CATHERINE BARCOMB
Executive Director



**COMMISSION FOR THE
PRESERVATION OF WILD HORSES**

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In the interest of maintaining and improving dry and wet meadows in the Great Basin, the two inch stubble height may expose soil to erosion, be subject to mechanical damage and will not provide cover for wildlife species.

We suggest amending the matrices to include stubble heights or percent of annual growth to better present the standards to be implemented on the Inyo Forest.

Thank you for consulting the Commission.

Sincerely

Catherine Barcomb
Director