

7-20-93



STATE OF NEVADA
DEPARTMENT OF WILDLIFE

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Governor

WILLIAM A. MOLINI
Director

July 20, 1993

Mr. Tony Danna
Surprise Resource Area
Bureau of Land Management
P.O. Box 460
Cedarville, California 96104-0460

RE: Protest - Proposed Gather Plan - Bitner, High Rock, Nut Mountain, and Wall Canyon HMAs

Dear Tony:

Our agency appreciates the opportunity to review and comment on the Surprise Resource Area Wild Horse Gather and Removal for Bitner, High Rock, Nut Mountain and Wall Canyon Herd Management Areas. Six years of drought and winter conditions of 1992-93 had a dramatic impact on wildlife populations in northern Washoe County. Management actions to restore and improve critical wildlife habitats are necessary to allow wildlife populations to achieve their potentials.

Nevada's Bureau of Land Management has implemented national policy by issuing allotment evaluations and multiple use decisions for livestock, wild horse/burros and wildlife. We find that the proposed management actions of this gather plan do not fully assess ungulate impacts or present an integrated vegetation management system to assure wildlife habitat will be protected.

SPECIFIC COMMENTS

The Cowhead/Massacre Planning Unit MFP 3 Summary is the record of decision for the final grazing environmental impact statement. MFP 3 goals, objectives and decisions are the essential elements of the land use plan. Wild horse management consistent with the land use plan must establish a viable free roaming herd coexistent with livestock and wildlife to achieve a thriving ecological balance.

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Page 4, Definition

Please include definitions for "thriving natural ecological balance and viable free roaming herd".

Page 5, Issues

Please include livestock use and impact to riparian habitat.

Page 7, Wildlife

Wildlife depend upon riparian vegetation for food and cover. Species like the short-ear owl and northern harrier require residual vegetation for nesting cover. Utilization or allowable use levels on riparian habitat must produce stubble heights adequate to provide cover for wildlife.

Page 7, Wild Horses

The District concludes that wild horses were in good health and condition during the fall of 1992, suffered no winter loss and had an estimated rate of recruitment of 20% per year within these herd management areas. It is surprising to the Department that the Bureau did not feel wild horses were impacted by the drought and winter conditions of 1992-93.

Department of Wildlife helicopter surveys revealed extremely stressed wild horses in the fall of 1993. Severe reduction in free water, lack of forage and competition between livestock reduced the physical condition of wild horses and caused mortality in foals. Wild horses adjacent to the Susanville District were shot by the Bureau of Land Management for humane reasons in February 1993. The Winnemucca District conducted emergency gathers where 90 percent of the wild horses were in jeopardy. We cannot find supportive data for conclusions contained in your document relative to wild horse condition, mortality or survival.

Page 10, Current Wild Horse Population Levels

We agree that the mild winters since 1988 resulted in good survival of foals and an increase in wild horse populations. However, actual survey data collected in October 1992, should have provided adult to foal ratios to establish the 1992 recruitment data. These data should be provided to support the assumed 20% recruitment rate in 1992 for the 1993 population estimate.

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The observation of "bony horses" in March 1993, and general lack of horses within the herd management areas during May 1993, does not support the conclusion there was no winter loss during 1992-93. We suggest that wild horse surveys be conducted in August 1993, to determine numbers, distribution and foal survival.

Page 13, Monitoring Results and Recommended Management Levels

The terms "thriving natural ecological balance and carrying capacity" require definition.

The land use plan or MFP 3 Decisions set a management level for wild horses. A recent IBLA Hearing judgement required that wild horse appropriate management levels be set based upon rangeland monitoring data specific to wild horses. Use pattern mapping data, collected on livestock allotments within the herd management areas, are in Appendix 5. We assume that these allotments were jointly used with livestock and that livestock use varied depending upon voluntary non-use by the permittee. Since wild horse appropriate management levels are being established upon this use pattern mapping data, then how was ungulate use differentiated? Failure to disclose data, analyze and make livestock decisions with available rangeland monitoring data is contrary to Bureau of Land Management land use planning, policy and law.

Page 16, Livestock

The Cowhead/Massacre Grazing Final Environmental Impact Statement and MFP 3 Decisions did not set carrying capacities for allotments within these herd management areas. This draft document shows that MFP 3 wild horse numbers and livestock active preference figures were available several years since finalization of the land use plan. This document further explains that continued overutilization of riparian habitats contributed to ongoing degradation of these natural resources. Livestock numbers established in the land use plan are based upon average actual use prior to the MFP 3 Decisions. No later than five years after the land use plan, rangeland monitoring data were to be used to adjust livestock and wild horse numbers to carrying capacity and a thriving natural balance. Now, twelve years after the land use plan, the first attempt to adjust numbers is being made based upon monitoring data.

Failure to prepare allotment evaluations, issue manager's decisions or implement drought policies to protect natural resources has resulted in degraded rangeland conditions within the

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utilization to the minimum 40 percent, rather than the proposed maximum limit of 60 percent.

While accurate carrying capacity computations with existing data can be used to establish appropriate management levels for wild horses, the District's failure to fully account for livestock use on these allotments makes it difficult to manage for joint use. If reductions are made in wild horse numbers and livestock are permitted to near active preference levels, then we foresee problems with attaining the objective to improve riparian habitat.

Page 36, Influence of Livestock Management

Licensing of livestock is undertaken by issuing a 10 year license along with issuance of annual preference statements. These licenses are issued without environmental assessments and without consultation with affected interests. Increasing livestock actual use in 1993 was not assessed using monitoring data, in the same fashion the data was used to proposed for wild horse numbers in this gather plan. Since the data, procedures and policies are identical for both ungulates, we encourage the District to conduct full allotment evaluations and issue manager's multiple use decisions.

Sincerely,

WILLIAM A. MOLINI, DIRECTOR



Gregg Tanner
Acting Region I Manager
Region I

REL:rl/

CC: Habitat, Reno
Mike Dobel
NCPWH - Catherine Barcomb ✓