



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

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In Reply Refer To:
4700 (CA-370) P

Catherine Barcomb, Administrator
Commission for the Preservation of Wild Horses
123 W. Nye Lane, Room 230
Carson City, Nevada 89706-0818

Dear Cathy:

I regret that you did not understand our explanation of the methods and rationale that were used to establish a Carrying Capacity for the Bare Allotment and an Appropriate Management Level (AML) for the Fox-Hog Herd Management Area. The following is some additional information/discussion regarding our approach.

The method used for establishing the Carrying Capacity for the Bare Allotment (which includes all of the Fox-Hog HMA), can be found in BLM Technical Reference #4400-7, Appendix 2.

The Carrying Capacity was not established on a "one-time percentage of forage production". It was established using ten years of utilization, actual use, and precipitation data. (Evaluation pages 7-9 and Appendix 2; EA CA-370-99-08 page 13)

The AML for the Fox-Hog HMA was established using riparian area production estimates for two reasons:

#1 The evaluation of the Bare Allotment found that duration, timing, and intensity of use in riparian areas are the primary conflicts between livestock and wild horse grazing, and resource objectives. (Evaluation page 7)

#2 Unlike livestock, wild horse duration and timing of use in riparian areas cannot be effectively controlled by herding. The amount of fencing which would be required to control wild horse use of key riparian areas would be cost prohibitive, in conflict with resource objectives for the allotment, and potentially dangerous to the wildlife and wild horses in the area. (EA page 10) Therefore, the only tool available for moderating wild horse impacts in riparian areas is to control the

intensity of wild horse use. We intend to accomplish that goal by maintaining the number of wild horses at levels which will result in light or less utilization and trampling in key riparian areas. (Evaluation page 21)

Transects have been established on 18 key riparian areas in the Bare Allotment, including 12 in the Fox-Hog HMA. These key areas are in perennial riparian areas in which annual fluctuations in precipitation and runoff do not greatly affect production (as they do on uplands and ephemeral riparian areas in the Great Basin).

The BLM does not intend to adjust wild horse numbers annually. The allotment, including the key riparian areas, will be monitored during both livestock use and livestock rest periods over the next 10 to 12 years. At the end of this time, it is the intention of the BLM to re-evaluate both livestock and wild horse management impacts, in order to more accurately determine overall Carrying Capacity, wild horse Appropriate Management Levels, and appropriate livestock management methods.

I hope this information is helpful. If you have additional questions or concerns, we would be happy to meet with you at your convenience. Please let me know as soon as possible if you have additional questions and would like to meet.

Sincerely



Susan T. Stokke
Field Office Manager