



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

ELKO DISTRICT OFFICE

3900 E. Idaho Street
P.O. Box 831
Elko, Nevada 89801

177
7/27/89
TAKE
PRIDE IN
AMERICA

IN REPLY REFER TO:
4700
(NV-013)

Dear Interested Party:

Attached is a draft wild horse herd management plan and associated Environmental Analysis for the Goshute herd management area.

Please review and comment as appropriate and return comments to this office by July 31, 1989.

Sincerely yours,

RODNEY HARRIS
District Manager

Attachment



**COMMISSION FOR THE
PRESERVATION OF WILD HORSES**

Stewart Facility
Capitol Complex
Carson City, Nevada 89710
(702) 885-5589

COMMISSIONERS

Deloyd Satterthwaite, Chairman
Spanish Ranch
Tuscarora, Nevada 89834

Dawn Lappin
15640 Sylvester Road
Reno, Nevada 89511

Michael Kirk, D.V.M.
P.O. Box 5896
Reno, Nevada 89513

file copy

July 27, 1989

Rodney Harris, District Manager
BLM - Elko District Office
3900 E. Idaho Street
P.O. Box 831
Elko, Nevada 89801

Dear Mr. Harris,

Thank you for permitting me to comment on the Draft Goshute Herd Management Plan and associated Environmental Analysis.

I would like to know why you have not used the Wild Horse and Burro Habitat Evaluation Procedures Users Guide in preparing the draft HMAP. Even though the users guide is in draft form, it is being used in other districts.

I feel this is important and should be assimilated into your HMAP to protect critical habitat for the wild horses.

I would also like to know how you can manage animals if you don't know WHY they use a particular area, or why they use a specific species of plant?

In light of the recent ruling by IBLA, please provide the necessary data that shows how horses are impacting a "thriving ecological balance" in the herd area, and how you can justify any removals or maintenance of any specific "appropriate management level."

On page 5 of the HMAP, you state that 452 horses were claimed. Were all of these horses branded as required by the state brand laws? If the horses were not branded, was the claimant fined for failure to brand? Were the claimants assessed trespass fees for the non-permitted horses? How was the determination made that these horses were not wild and free-roaming?

Please provide me with the documentation (ie: copies of registration papers, brand inspections, etc.) that shows the claimed horses were "owned" horses.

On page 9, you conclude from your data that you have a stable population, yet your next sentence states you have a 9% rate of increase. Which is valid?

Rodney Harris
July 27, 1989
Page 2

Also, on page 9 you state that wild horse forage conditions are good with a good variety. If conditions are good, and the herd is over the AML, then the range is obviously in a "thriving ecological balance" and future reductions may not be necessary.

On page 10, you justify holding the AML at 96 to 120 horses through the Wells RMP.

As stated previously, the IBLA ruling would preclude holding at any specified number. The horses should be managed at a "thriving ecological balance."

On page 12, your objectives are to "Provide 1440 AUM's of forage for wild horses..." Were the AUM's adjudicated in the Wells RMP?

In B. Animal Objectives - what is meant by "actual use" by horses? Also on page 12, under "Management Methods," you state that the horse population will be maintained at the AML. I again refer you to the IBLA ruling and suggest your management be in accordance with that ruling.

On page 13, 2. b., you discuss "proportionate adjustments" in forage and you use the AML to base the adjustments on. This is no longer applicable as per IBLA, so horse numbers and adjustments must be made on a "thriving ecological balance."

Also on page 13, you state that water developments are needed for wild horses. The Commission would be very interested in looking at providing funding for any or all of these projects.

If you have costs estimates for these projects, please forward them to the Commission office for review. I would be more than happy to work with a member of your staff on developing a grant proposal.

Again, on page 15, you attempt to justify removals based on the AML. The IBLA ruling has made this an invalid justification.

At the bottom of page 15, you state that the horse program is a "relatively new program." If the program was a person, it would be old enough to VOTE!

Page 16, B.1., No justification for maintaining at AML.

In the EA - No. NV-010-9-051, on page 2, you state that "Better management of the Goshute herd would please local sportsmen and livestock operators." What is meant by "Better Management?" Further reductions? Better for the horses or better for the sportsmen and livestock operators?

Rodney Harris
July 27, 1989
Page 3

Also, same paragraph, last sentence, IBLA ruling applies.
Page 2, "Water" - no justification for "maintaining" wild horse numbers.

Page 2, 4. - Wild Horse and Burro - "All waters in the HMA will be available to wild horses". Does this mean that all wells will remain turned on year-round?

Page 3, 6. - There is no justification for "maintenance" of wild horse numbers at AML. In the third paragraph, you state that "Decreased grazing pressure... would improve the ecological balance..." Please provide the monitoring data that demonstrates this.

On page 4, 7. Wildlife - How will implementation of the HMAP allocate a share of forage to wildlife? Wasn't this done in the RMP?

Also on page 4, 9. Livestock Grazing - Please provide your justification for management of wild horses at "prescribed numbers" in light of the IBLA ruling.

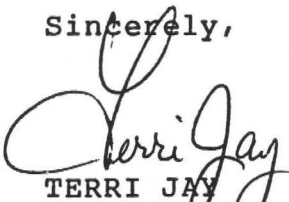
In conclusion, I feel that implementation of the draft HMAP as presently written, would be in violation of the IBLA ruling.

I also believe that it is extremely important to have the site specific data on the wild horse herd area as required in the Habitat Evaluation Procedures Users Guide, BEFORE you develop a herd management area plan. Habitat must be evaluated as an integral part of any HMAP.

I look forward to hearing from you further in this matter.

Thank you for your time.

Sincerely,



TERRI JAY
Executive Director

TJ/cb

GOSHUTE
WILD HORSE
HERD MANAGEMENT AREA PLAN
1989

TABLE OF CONTENTS

	<u>PAGE</u>
I. INTRODUCTION.	1
A. Location	1
II. BACKGROUND INFORMATION.	1
A. Relation to Planning Documents	1
B. Resource Information	1
1. Vegetation.	1
2. Soils	2
3. Animals	3
a. Wildlife	3
b. Livestock.	3
c. Wild horses.	4
1) History	4
2) Present Situation	5
C. Reference to the Land Use Plan	10
D. Existing Projects.	10
III. OBJECTIVES.	12
A. Habitat Objectives	12
B. Animal Objectives.	12
IV. MANAGEMENT METHODS.	12
A. Habitat Maintenance and Improvements	12
B. Animal Characteristics and Population Levels	15

TABLE OF CONTENTS (Continued)

	<u>PAGE</u>
V. EVALUATION AND REVISION	15
A. Habitat Studies.	16
1. Utilization	16
B. Wild Horse Population Studies.	16
1. Population Estimates.	16
3. Animal Condition.	16
4. Sex Ratio -- Age Structure Determination.	17
VI. MODIFICATION AND REVIEW	17
VII. REFERENCES.	17
VIII. APPROVAL.	18
Appendix I -- Maps	

GOSHUTE WILD HORSE
HERD MANAGEMENT AREA PLAN
1989

I. INTRODUCTION

A. Location

This activity plan (HMAP) is developed to set forth management goals and objectives for the Goshute herd management area. Wild free roaming horses will be managed to achieve and maintain a thriving ecological balance on public lands (BLM).

The Goshute herd management area is located in eastern Elko County, Nevada. It lies approximately 95 miles east of Elko, Nevada and 145 miles west of Salt Lake City, Utah. Wendover, Utah/Nevada is approximately 15 miles east of the herd area. The Goshute Mountain range forms the bulk of the herd area from White Horse Pass to Silver Zone Pass.

The area is in spruce/Goshutes Resource Conflict Area (RCA) of the Wells Resource Area. The area consists of approximately 283,440 acres of which 94% is public (BLM) land.

II. BACKGROUND INFORMATION

A. Relation to Planning Documents

The Wells Resource Management Plan (RMP) was completed in 1985. The RMP described the physical resources of the herd area, the condition/problems of the wild horse population, and the estimated population. Problems identified in the RMP included those associated with construction of fences which would pose barriers to horse movement and poor distribution of water sources.

The Wells RMP was approved July 16, 1985, and the Rangeland Program Summary (RPS) was completed in September 1986. These decision documents established an Appropriate Management Level (AML) of 96 to 120 wild horses in the Goshute HMA.

Objectives for wild horses from the RMP were to maintain existing populations, and develop waters for better distribution.

B. Resource Information

1. Vegetation

Six vegetative types occur within the herd management area. Pinyon-juniper, sagebrush-grass, greasewood, and salt desert shrub types are the most prevalent types in the area. Averages by types are as follows:

<u>Type</u>	<u>Acres</u>	<u>Percent</u>
Pinyon-juniper	119,680	42
Salt desert shrub	65,920	23
Greasewood	61,680	22
Sagebrush	29,040	10
Mountain shrub	7,120	3
	<u>283,440</u>	<u>100</u>

No threatened or endangered plants are known to exist within the herd area.

Present range condition and trend data is lacking on the area. Personal observation would indicate fair to good range condition on a majority of the herd area. Local areas in the southwest portion of the herd area are in poor condition class. Good range condition is found on the benches and valley floor in Goshute Valley, the benches on the east side of the Goshute range, and on the unwatered ridges and canyons throughout the herd management area.

Fair range condition is generally found on the watered portions of the herd management area in Morris Basin, Morgan Basin and Lion Canyon.

No apparent trend has been noted at this time.

2. Soils

The soils in the Goshute Herd Area are generally loams, clay loams, and silty loams. In the mountains the soils are generally Mollisols derived from the limestone parent material and are moderately to highly productive and resistant to erosion. Soils on the benches and alluvial fans are generally Aridisols with petrocalcic hardpans. They are generally moderately productive and resistant to erosion. Soils in the valley floors are generally Aridisols developed from alluvial parent materials. They are generally alkaline in character and slightly productive. Mollisols derived from granitic parent materials are found in the Morgan and Morris Basins area. These soils are moderately susceptible to erosion and are moderately productive.

3. Animals

a. Wildlife

The Goshute herd area contains many species of wildlife. The more common include mule deer, antelope, chukar partridge, bobcats, mountain lions, golden eagles, red-tailed hawks, prairie falcons, black-tailed jackrabbits, badgers, and various species of rodents. There are no species of fish within the herd area.

The Goshute herd area is identified as mule deer yearlong range with winter concentration area in Morgan Basin and along the west slope in the Big Springs Allotment. Reasonable numbers for mule deer are as follows:

Winter - 300 deer and 375 AUMs
Summer/yearlong - 450 deer 1013 AUMs

There is yearlong habitat for antelope in the herd area on the benches on each side of the mountain range. Observations indicate approximately 50 antelope inhabit these areas. No crucial areas for antelope have been identified.

It is suspected that the majority of the herd area is crucial habitat for cliff nesting species of raptors such as golden eagles, prairie falcons, and red-tailed hawks.

The southwest portion of the Goshute range is presently under consideration for reestablishment of bighorn sheep. NDOW has determined that there is habitat present, but water would have to be developed to support a reestablishment. Bighorn sheep occurred on this range historically. A ram's head was found by NDOW in 1976 on the slope above Basque Well.

The southwest portion of the herd area is a crucial wintering area for golden and bald eagles. Bald eagles are the only known threatened or endangered species within the Goshute Mountain Herd Area.

b. Livestock

There are portions of seven allotments within the herd area (see Map No. 1). The five allotments on the east and south sides are sheep allotments. The Big Springs Allotment on the northwest side is a cattle allotment and the Spruce Allotment is grazed with both cattle and sheep grazing on it. The majority of the use is made in the winter season, with some overlap into spring. Winter livestock use allows horses to use the area without competition during the spring, summer fall season. This

ensures that horses enter the winter strong and in good flesh. The normal operation for each allotment is as follows:

<u>Allotment</u>	<u>Number and Class of Livestock</u>	<u>Season of Use</u>	<u>Demand (AUM's)</u>		<u>Suspended and Regular Nonuse</u>		<u>AUM's 1/ Use within the Herd Area</u>
			<u>Class I Active</u>				
Big Springs <u>2/</u>	800 Cattle	12/1 to 3/30	2,400		- - -		2,400
Spruce	1,700 Cattle	11/1 to 5/31	36,031				Unknown
	3,000 Sheep	11/1 to 6/30					
Pilot	1,400 Sheep	11/15 to 4/15	5,127				275
Leppy Hills	2,400 Sheep	11/28 to 4/15	3,746				69
UT-NV No.1 <u>3/</u>	2,600 Sheep	11/10 to 5/9	4,447		1,199		2,179
Lead Hills	3,800 Sheep	12/16 to 4/15	3,040		4,890		2,128
White Horse	2,200 Sheep	11/1 to 4/15	2,376		5,124		238
							<u>7,289</u>

1/Estimated from use supervision observations and conversations with the operators involved.

2/Figures are from only that portion of the allotment within the herd area.

3/Implemented AMP. A portion of the North Pasture is within the herd area.

c. Wild Horses

1) History

It is not known when the first horses were released into what is now known as the Goshute Herd Area. Conversations with local residents indicate that there were horses grazing in the herd area at the turn of the century. Field notes from the range survey conducted in 1939 note the abundance of "wild horses" on the area. It is believed that the horses on the Goshutes Herd Area are descendants of horses of horses that were owned by various ranchers and miners in the area. The herd area is a part of the old UC Ranch which ran livestock in half of Elko County from the time the Taylor Grazing Act of 1934 was passed until 1945. They were licensed for over 1,000 head of horses which were used in their ranching operations in Nevada and construction operations in Utah. Most of the horses were gathered each year, but a few escaped gathering. The continual gathering attempts made the horses that escaped increasingly more-difficult to capture in succeeding gathering operations.

*Private herd
used to justify claim*

In the 1940's Gilbert McCauley, who was a cowboy for the UC Ranch, acquired eight (8) horses via a will from A.H. Greene. Mr. McCauley took up residence in a cabin on Dead Cedar Spring in the southeast corner of the herd area. Mr. McCauley captured the horses, sold what he could, and then branded and turned the rest out on the public lands. This practice was continued until 1971 when the Wild Horse and Burro Act was passed. Mr. McCauley claimed 250 horses on the Goshute Mountains in 1973 when the claiming regulations were finalized. 334 horses were water-trapped by Gilbert McCauley in the summers of 1974 and 1975. These horses were determined by the Bureau of Land Management to belong to Mr. McCauley. In October 1976 the remainder of Gilbert McCauley's horses were sold to Big Springs Ranch. These horses were gathered in the summer of 1977 and winter of 1977-78. 452 horses were removed under the claiming process. These horses were the horses claimed by Mr. McCauley and their offspring.

2) Present Situation

a) Introduction

The horses in the Goshute herd area summer in the Morris Basin, Erickson Canyon, Morgan Basin areas, which is on the east side of the Goshute range. This is due to the springs that provide water in this area. The west slope of the Goshute range is essentially dry. Horses generally go to the west side of the Goshute range in the winter and use the lower breaks for cover while grazing the white sage flats on the valley floor.

b) Census Results

The first census after the passage of the PL 92-195 was conducted in 1975 (this includes some privately-owned claimed horses) and censuses have been conducted periodically up to the present time. The following table shows census results:

<u>Year</u>	<u>Population Count</u>	<u>Method of Inventory</u>
1975	151	B-1 helicopter
1978	129	B-1 helicopter
1981	120	B-1 helicopter
1983	200 horses/burros	B-1 helicopter
1984	214	Jet Ranger
1985	257	B-1 helicopter
1987	366	B-1 helicopter
1988	*135	B-1 helicopter

*Census was conducted after completion of gather and removal of 309 horses in 1987 and 1988.

Research conducted by Siniff, et al, (1981) suggests that when conducting an aerial census, only a percentage of the total number of animals are ever counted. However it is not clear what percentage is missed so no adjustment of population data has been made.

c) Demographic Analysis

The overall condition of the horses in the HMA is good. Occasionally a poor condition horse is found -- its condition a result of lameness, old age, injury, parasites, disease, and/or nutritional deficiencies. The majority of the horses in the HMA are sound, relatively healthy, and adapted to the type of environment they live in.

Based on 1987 and 1988 capture data, the following table shows color variations on wild horses in the Goshute HMA:

<u>Color</u>	<u>Number of Horses</u>	<u>Percentage</u>
Red Roan	2	0.6
Bay	70	22.7
Buckskin	21	6.8
Sorrel	88	28.5
Brown	40	12.9
Chestnut	2	0.6
Palomino	19	6.2
Gray	18	5.8
Black	25	8.1
Red dun	12	3.9
Strawberry Roan	7	2.3
White	1	0.3
Grulla	4	1.3

1987 and 88 capture data also shows a sex ratio of 60% females to 40% males.

Age distribution is an important population characteristic which influences both natality and mortality (Odum, 1971). Odum states further that the ratio of the various age groups in population can be determined from the age structure.

Populations can be divided into three separate ecological periods: preproductive, reproductive, and postreproductive (Smith 1974). Reproduction is restricted to certain

age groups and mortality is more prevalent on others. The following table depicts age structure for the Goshute herd based on 1987 and 1988 capture data:

<u>Age</u>	<u>Percentage</u>
20	5.1
19	0.0
18	0.0
17	0.3
16	0.0
15	0.9
14	0.3
13	0.0
12	1.9
11	0.6
10	1.9
9	1.6
8	1.9
7	3.5
6	5.8
5	6.7
4	6.4
3	11.3
2	15.5
1	21.6
1	13.9

The above may not be a true reflection of age structure for horses remaining on the herd area as younger age classes seem to be captured easier, therefore, leaving older horses on the range.

Mortality rates in a wild population are difficult to determine. Many ways are available to obtain estimates of mortality, but these are only approximations. One such way to do this is by taking a population sample and developing a time specific life table. This data is limited but does provide a starting place to determine mortality and conversely survival. The following life table is for the Goshute herd area based on 1987 and 1988 capture data:

Life Table

Age	Frequency or No. Animals	Survival	Mortality	Mortality Rate	Survival Rate
X	FX	LX	DX	QX	PX
0	83	1.000	0.217	0.217	0.783
1	65	0.783	0.349	0.446	0.554
2	36	0.434	0.109	0.251	0.749
3	27	0.325	0.072	0.222	0.778
4	21	0.253	0.072	0.284	0.716
5	15	0.181	0.036	0.199	0.801
6	12	0.145	0.097	0.669	0.331
8	4	0.048	0.024	0.500	0.500
9	2	0.024	0.000	0.000	1.000
10	2	0.024			
10+	30				

Using the life table above a rate of increase can be determined using the following formula: (BLM Manual 4730)

A = Estimated number of adults in population (one year old and older)

B = Foals/100 adults (percent)

F = Number of foals

Zf = Mortality foals (percent)

Nf = Mortality foals (number)

Za = Mortality adults (percent)

Na = Mortality adults (number)

Y = Total population estimate (adults and foals)

P = Projected population

I = Population increase or decrease

$$(A)(B) = F$$

$$(F)(Zf) = Nf$$

$$(A)(Za) = Na$$

$$A + F = Y$$

$$Y - (Nf + Na) = P$$

$P - A = I$ (increase or decrease) if P is less than A reverse P and A in formula.
Values will be a decrease in total population.

$\frac{I}{P}$ = Population increase--where P is greater than A.

$\frac{I}{A}$ = Population decrease--where P is less than A.

Plugging the data in to this formula produces the following result:

A = 226

B = 37%

F = 83

ZF= 21.7%

NF= 18

Za= 29%

Na= 65

Y = 309

P = 226

I = 0

This indicates a stable population neither increasing or decreasing. This is reasonable with census data which indicates the population is increasing, at appropriately 9% per year. Using capture data could also indicate that when capturing horses more younger age class horses are captured than older.

A reproductive rate was also calculated based on 1988 capture data and 1988, 1985, and 1983 census data. The reproductive rate was calculated as an average 34% based on the formula:

$$\text{Reproductive Rate} = \frac{\text{Number of animals 0 - 1 year of age}}{\text{Number of animals 1 year of age and older}}$$

With the exception of the demographic data shown above, which came from capture data and may not give a true picture, little is known concerning sex ratio, age structure, young adult ratio and actual use.

Habitat Condition and Use

Wild horse habitat requirements are forage, water, cover, and living space. Wild horse habitat requirements are adequate in the Goshute herd area, however, water is poorly distributed and is primarily on the east side of the herd area (see attached map).

Cover is provided by the mountainous topography and the many pinyon-juniper stands in the area.

Wild horse forage conditions are good with a good variety of grasses, forbs, and shrubs.

The majority of the horse use occurs in the salt desert shrub, pinyon-juniper, and the sagebrush types. These types are especially important where an edge effect is created with the pinyon-juniper type. Use on the salt desert is made primarily in the winter, while the sagebrush and pinyon-juniper types are used in the spring, summer, and fall.

This was confirmed by a fecal analysis study conducted in this area in 1980 and 1981. Some monitoring studies have been established in the herd area, but primarily in areas only slightly used by horses. More studies are needed to

determine extent, intensity and duration of use by horses and the extent that use areas overlap with livestock, and wildlife. Ecological site condition has not been determined on the herd area.

C. Reference to the Land Use Plan

The Wells RMP established an AML of 96 to 120 horses. There are seven livestock grazing allotments within the herd area, but only one of the allotments is covered by an AMP. The AMP does not impact wild horses, as no fences are called for and the use is winter when horses are not in the AMP area. None of the allotment perimeters are completely fenced which allows horses to move around the herd area at will and does not inhibit their free roaming behavior. The RMP emphasized the use of herding and manipulation of water to manage livestock.

An allocation of forage was not made in the Wells RMP. The decision was made to initiate monitoring and adjust populations either up or down based on monitoring. In the interim wild horse populations were to be held at the AML levels shown in the RMP for each herd area.

*no just for
at AML
IBLA*

D. Existing Projects

Very few fences exist in or near the herd area. What few that exist touch the edge of the herd area, but are not barriers to herd movements. The remaining projects are water developments primarily wells that are only pumped when livestock are in the area, which has been winter use. This is also the time when the horses are in the areas where the wells are located.

The following table shows existing projects within the herd area:

<u>PROJECT NUMBER</u>	<u>PROJECT NAME</u>	<u>LOCATION</u>	<u>REMARKS</u>
0257	Shafter Well	NE $\frac{1}{2}$ SE $\frac{1}{2}$, sec. 12, T. 33 N., R. 67 E.	Good Condition
0324	Itcaina Black Point Well	SW $\frac{1}{2}$ SW $\frac{1}{2}$, sec. 6, T. 29 N., R. 68 E.	Good Condition
0430	Shafter Well No. 3	NW $\frac{1}{2}$ NW $\frac{1}{2}$, sec. 36, T. 32 N., R. 67 E.	Good Condition
0441	Shafter Well No. 4	SW $\frac{1}{2}$ SE $\frac{1}{2}$, sec. 35, T. 31 N., R. 67 E.	Good Condition
0671	Playa Reservoir	SE $\frac{1}{2}$ NW $\frac{1}{2}$, sec. 5, T. 33 N., R. 69 E.	Good Condition; dry in 1977
0836	Shafter and Spruce Fence	T. 32 N., R. 67 E. T. 33 N., R. 67 E. T. 33 N., R. 66 E.	4-strand barbed wire; steel posts; Good Condition
0966	Big Springs- Silver Zone Fence	Secs. 17 and 20, T. 35 N., R. 68 E.	4-strand barbed wire; steel posts; Good Condition
1336	White Horse Fence	T. 29 N., R. 68 E.	4-strand barbed wire; wood posts; Good Condition
4223	Basque Well	NE $\frac{1}{2}$ SE $\frac{1}{2}$, sec. 14, T. 31 N., R. 67 E.	Good Condition
4401	Black Point Well	SW $\frac{1}{2}$ NE $\frac{1}{2}$, sec. 10, T. 30 N., R. 67 E.	Good Condition
5007	Shafter Well No. 1	NE $\frac{1}{2}$ SE $\frac{1}{2}$, sec. 16, T. 34 N., R. 67 E.	Good Condition
5008	Shafter Well No. 2	NW $\frac{1}{2}$ NW $\frac{1}{2}$, sec. 2, T. 32 N., R. 67 E.	Dugout overflow pond; Good Condition
5006	Silver Zone	NE $\frac{1}{2}$ NW $\frac{1}{2}$, sec. 24, T. 35 N., R. 67 E.	Good Condition
Private	Western Pacific Fence	T. 34 N., R. 66 E. T. 34 N., R. 67 E. T. 35 N., R. 67 E.	Wood posts; 4-stand barb wire; Good Conditions

III. OBJECTIVES

A. Habitat Objectives

1. Maintain the forage use levels for all herbivores within the herd management area at a level which does not exceed proper use of key forage plant species. Provide 1440 AUMs of forage for wild horses in the Goshute herd management area.
2. Improve water distribution to alleviate pressure on Morgan Basin and Morris Basin during spring-summer-fall season.

Total allocated in Wab/RMP

B. Animal Objectives

1. Maintain a healthy population by assuring that adequate spring, summer, fall forage is available.

What is meant by actual use? Forage?

2. Acquire data on the demographic characteristics of the wild horses in the Goshute herd management area. This would include information on sex ratios, age structures, young/adult ratios, and actual use. These parameters will be analyzed to determine natality, mortality and rate of increase.

IV. MANAGEMENT METHODS

A. Habitat Maintenance and Improvements

The planned actions needed to achieve the habitat objectives established in this plan are as follows:

1. To maintain good range condition over the bulk of the herd area and to improve range condition in Morgan Basin and Morris Basin the following steps will be taken:

- a. The wild horse population will be maintained within a range of 96 to 120, planning for removals will be initiated whenever census shows the population exceeding 120 horses. Whenever roundups are conducted to remove excess animals, capture efforts will be concentrated within those areas where animals concentrate to maintain Proper utilization of key forage species.
- b. Season of use for livestock should not be changed from its current winter use.
- c. Key areas will be established through consultation and coordination with affected interests. The results of monitoring studies on these key areas will be used for subsequent adjustments in the numbers of grazing animals, either up or down.
- d. Utilization levels on key areas and use mapping, will be used as one of the major factors in determining the number of animals to be maintained in the HMA. Acceptable utilization levels on key forage species will generally be 55% on grasses and forbs and 45% on shrubs, this would be by all foraging animals.

Monitoring of data must show horses impact on this. Ecot. Bal. Horses or all?

2. If monitoring data shows reductions of animal numbers are necessary, adjustments will be made in the following manner:
 - a. Where a kind of foraging animal can be identified as the primary cause of forage resource damage in a specific area, adjustments will be made from the base levels for that particular kind of animal (active preference for livestock, AML for wild horses, and reasonable numbers for wildlife). This foraging animal will be determined from monitoring studies, utilization, actual use, sightings, counts, etc.
 - b. Where a single kind of foraging animal cannot be identified as the primary cause of forage resource damage, adjustments will be made proportionately between livestock and wild horses according to forage preference (i.e., grazing animals vs. key grass species and browsing animals vs. key shrub species). The proportionate adjustments will be based upon active preference for livestock AML for wild horses, and reasonable numbers of wildlife. *should be given priority*
 - c. If additional forage is available on a permanent basis based on trend data, and after meeting livestock number objectives, AML for wild horses, and reasonable numbers for wildlife, additional forage may be divided proportionately among all foraging animals based on animal numbers and forage preference. Any changes in available forage will be allocated in accordance with 43 CFR 4110.3.

3. Water availability and distribution will be improved by the development of springs, pipelines, and catchments where necessary. Many areas receive very little use due to the lack of water. Improved water distribution will relieve heavy grazing pressure in many areas particularly those areas near available water as a result of better distribution of grazing animals.

The following list of water sources, are shown in priority for wild horses and could be either maintained or developed when and if funding becomes available:

Request funding from Commission

<u>Water Source</u>	<u>Location</u>	<u>Development Needed</u>
Tunnel Spring	SW $\frac{1}{2}$ SW $\frac{1}{2}$, sec. 28, T. 34 N., R. 68 E.	Water piped into holding pond outside water trap
Rock Spring	NE $\frac{1}{2}$ NE $\frac{1}{2}$, sec. 10, T. 33 N., R. 68 E.	New pipe into tank; holding pond
Morris Basin Spring	SE $\frac{1}{2}$ SE $\frac{1}{2}$, sec. 11, T. 33 N., R. 68 E.	*Complete development
Rosebud Spring	SW $\frac{1}{2}$ NW $\frac{1}{2}$, sec. 26, T. 33 N., R. 68 E.	*Complete development
Tommy Jones Spring	SW $\frac{1}{2}$ SW $\frac{1}{2}$, sec. 35, T. 33 N., R. 68 E.	Water piped into water holding pond outside trap
North Morgan Spring	SE $\frac{1}{2}$ NW $\frac{1}{2}$, sec. 14, T. 32 N., R. 68 E.	Water piped into holding pond outside water trap
Blue Bell Spring	NW $\frac{1}{2}$ SW $\frac{1}{2}$, sec. 14, T. 32 N., R. 68 E.	*Complete development
Morgan Springs	SE $\frac{1}{2}$ SE $\frac{1}{2}$, sec. 15, T. 32 N., R. 68 E.	*Complete development
Mud Spring	NW $\frac{1}{2}$ NW $\frac{1}{2}$, sec. 24, T. 32 N., R. 68 E.	*Complete development
Spring Gulch Spring	NE $\frac{1}{2}$ NE $\frac{1}{2}$, sec. 26, T. 32 N., R. 68 E.	Water piped into holding pond outside water trap
Summit Spring	NW $\frac{1}{2}$ SW $\frac{1}{2}$, sec. 22, T. 32 N., R. 68 E.	Water piped into holding pond outside water trap
Chokecherry Spring	SW $\frac{1}{2}$ NW $\frac{1}{2}$, sec. 33, T. 32 N., R. 68 E.	Water piped into holding pond outside water trap
Lion Spring	NE $\frac{1}{2}$ NW $\frac{1}{2}$, sec. 16, T. 31 N., R. 68 E.	*Complete development
Serviceberry Spring	SW $\frac{1}{2}$ NE $\frac{1}{2}$, sec. 27, T. 31 N., R. 68 E.	*Complete development
Felt Spring	SE $\frac{1}{2}$ SE $\frac{1}{2}$, sec. 12, T. 30 N., R. 68 E.	*Complete development
Little Mud Spring	SE $\frac{1}{2}$ NE $\frac{1}{2}$, sec. 17, T. 30 N., R. 69 E.	*Complete development
Shafter Well No. 3	NW $\frac{1}{2}$ NW $\frac{1}{2}$, sec. 36, T. 32 N., R. 67 E.	Overflow holding pond
Basque Well	NW $\frac{1}{2}$ SE $\frac{1}{2}$, sec. 14, T. 31 N., R. 67 E.	Overflow holding pond

*Complete development denotes installation of a spring box, water tank, and overflow reservoir.

Development will be done as funds are available and within the scope of the land use plan.

B. Animal Characteristics and Population Levels

The planned actions needed to achieve the animal objectives established in this plan are as follows:

1. In order to maintain the wild free-roaming characteristics of the horses in the Goshute HMA, the following will be accomplished:

a. All projects proposed for the Goshute HMA will be analyzed in depth through an Environmental Analysis (EA) to determine if the project will impact the wild free-roaming characteristics of wild horses. Wild horse distribution, seasonal movements, daily movements, and home ranges will also be preserved by employing the provisions of NSO Manual Supplement 4730, Release NV 4-6.

b. Resource uses involving an increase in human activity in the HMA (eg mining) and fences will be evaluated closely. These types of activities are more apt to impact the free-roaming characteristics of the horses. Each activity or project will be analyzed on an individual basis. In analyzing the impacts, the overall and cumulative impact will also be analyzed.

2. In order to manage the number of wild horses, (96 to 120) at the Appropriate Management Level (AML) from which to begin monitoring studies within the HMA, the following actions are necessary:

a. Conduct periodic gathers and removal of excess horses. This will require a gather and removal every three or four years. Gathers will be based upon census which will be conducted every 2 or 3 years. Removals will be planned when numbers based on census exceed 120 head.

BLA ruling

the justification

V. EVALUATION AND REVISION

This plan and associated studies will be evaluated periodically to determine if objectives are being met.

20 year old?

As the wild horse program is a relatively new program, much of the data necessary to effectively manage the horses is unavailable. Thus the need for studies is essential. Studies will be established as necessary to collect the necessary data. The following studies have been or will be conducted to evaluate the effectiveness of the management methods identified in this plan in meeting the objectives.

A. Habitat Studies

1. Utilization

Utilization studies help to evaluate management systems by determining patterns and quantity of use. The Expanded Key Forage Plant Method is the technique adopted for this management plan. Section 4412.22 of the Bureau of Land Management Manual and the Nevada Range Monitoring Procedures Handbook (1981) delineates this particular method in detail. Utilization data will be collected annually contiguous with movement of livestock from the management area. The utilization studies will be timed where possible to determine the utilization made by livestock and wild horses combined when the two species occupy the HMA, and the utilization made exclusively by wild horses and wildlife when livestock are removed from the area. Data will be correlated with, wild horse population estimates, and livestock actual use information.

B. Wild Horse Population Studies

1. Population Estimates

Wild horse population estimates will be used to determine if No.s are being maintained at AML levels established in the Land Use Plan. Estimates will be obtained from aerial census. The census will be conducted every three years or more often if funds are available. Every three years is in accordance with NSO Manual Supplement 4730. The census will place animals in adult, foal, and yearling categories.

Locations of wild horses, will be recorded as described in NSO Manual Supplement 4730, for the purpose of determining wild horse concentration areas.

First year survival rates will be approximated through shrinkage of foal incidence between post-parturition composition surveys and parturition surveys (Wolfe 1980). Such surveys will be conducted in July and January of every third year if possible.

2. Animal Condition

Since the general condition of the animals is also an indicator of the population health and habitat conditions, during any on-the-ground observations or aerial censuses, all negative animal conditions will be recorded. Some of the conditions that will be recorded are deformities within individual bands, glossiness of coat, fleshiness of animals, etc.

3. Sex Ratio--Age Structure Determination

Both the sex ratio and age structure of the population of wild horses in the HMAs will be estimated from an analysis of capture data obtained whenever excess animals are removed. This information will be further supplemented by developing basic life tables as described in NSO Manual 4730.

VI. MODIFICATION AND REVIEW

A joint review of this plan will be conducted periodically by the Elko District Wild Horse Specialist and the Wells Resource Area Manager. This plan may be modified if data from public input, resource studies, or experience gained in plan operation indicate that changes are desirable.

All studies will be evaluated to see if objectives are being met. If not this plan may have to be revised.

It is understood that all actions undertaken pursuant to this plan are contingent upon available funding.

VII. REFERENCES

Odum, Eugene P. 1971. Fundamentals of Ecology W.B. Saunders Company, 3rd Ed, Philadelphia, PA 574 PP.

Range Studies Task Group. 1981. Nevada Range Monitoring procedures, preliminary draft.

Siniff, D.B., J.R. Tester, R.D. Cook and G.S. McMahon. 1981. Census methods for wild horses and burros. Interim Report. Bureau of Land Management Contract No. AA851-CTO-52. 46 PP.

Smith, R.L. 1974. Ecology and Field Biology. Harper and Rowe, Publ., Inc., 2nd ed., New York, NY. 850 PP.

VIII. APPROVAL

Prepared by:

.....

Bruce E. Portwood
Wild Horse Specialist
Elko District

.....

Date

Recommended by:

.....

John Phillips, Area Manager
Wells Resource Area

.....

Date

Approved by:

.....

Rodney Harris
District Manager

.....

Date

Concurred by:

.....

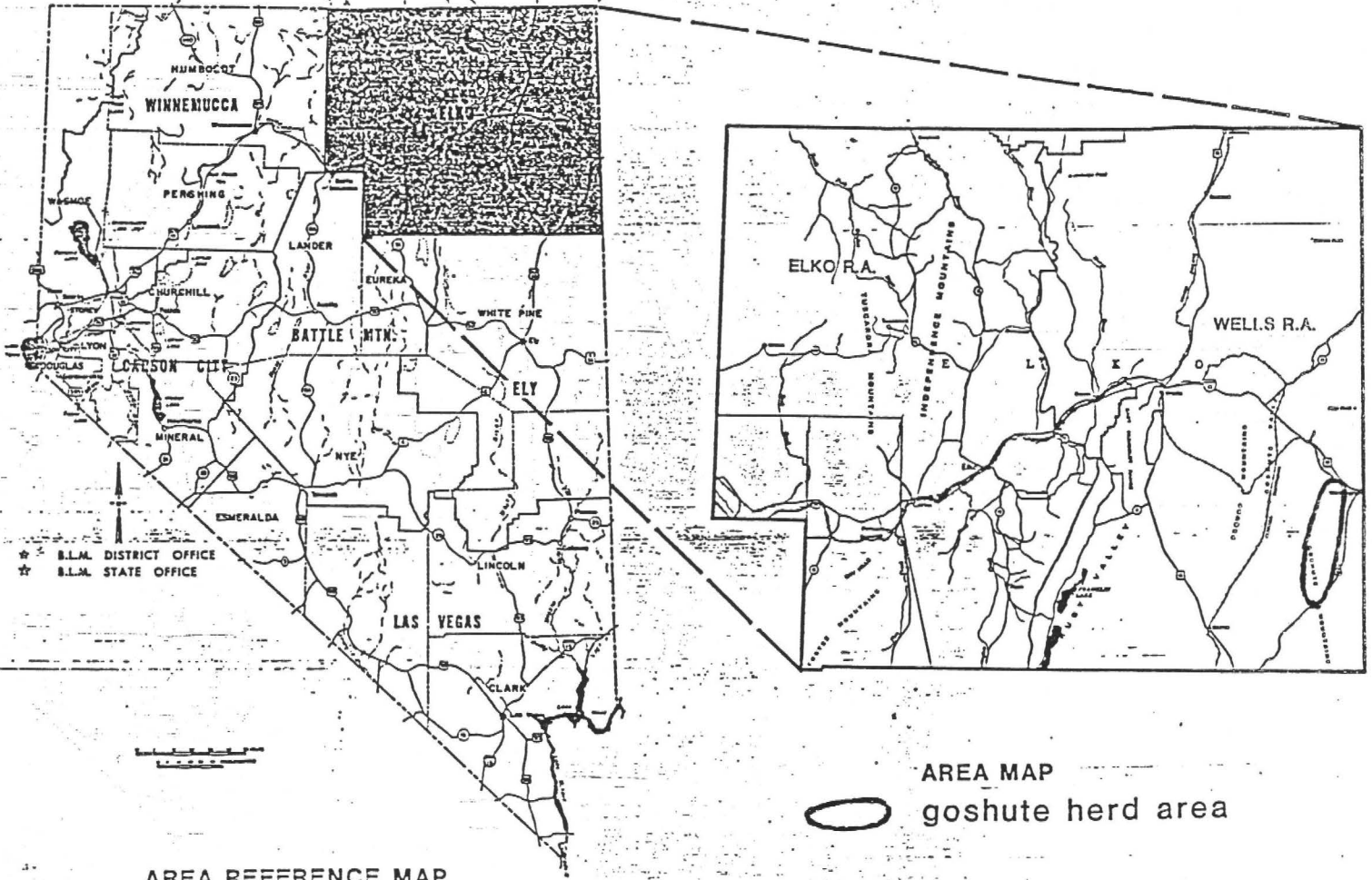
Edward F. Spang
Nevada State Director

.....

Date

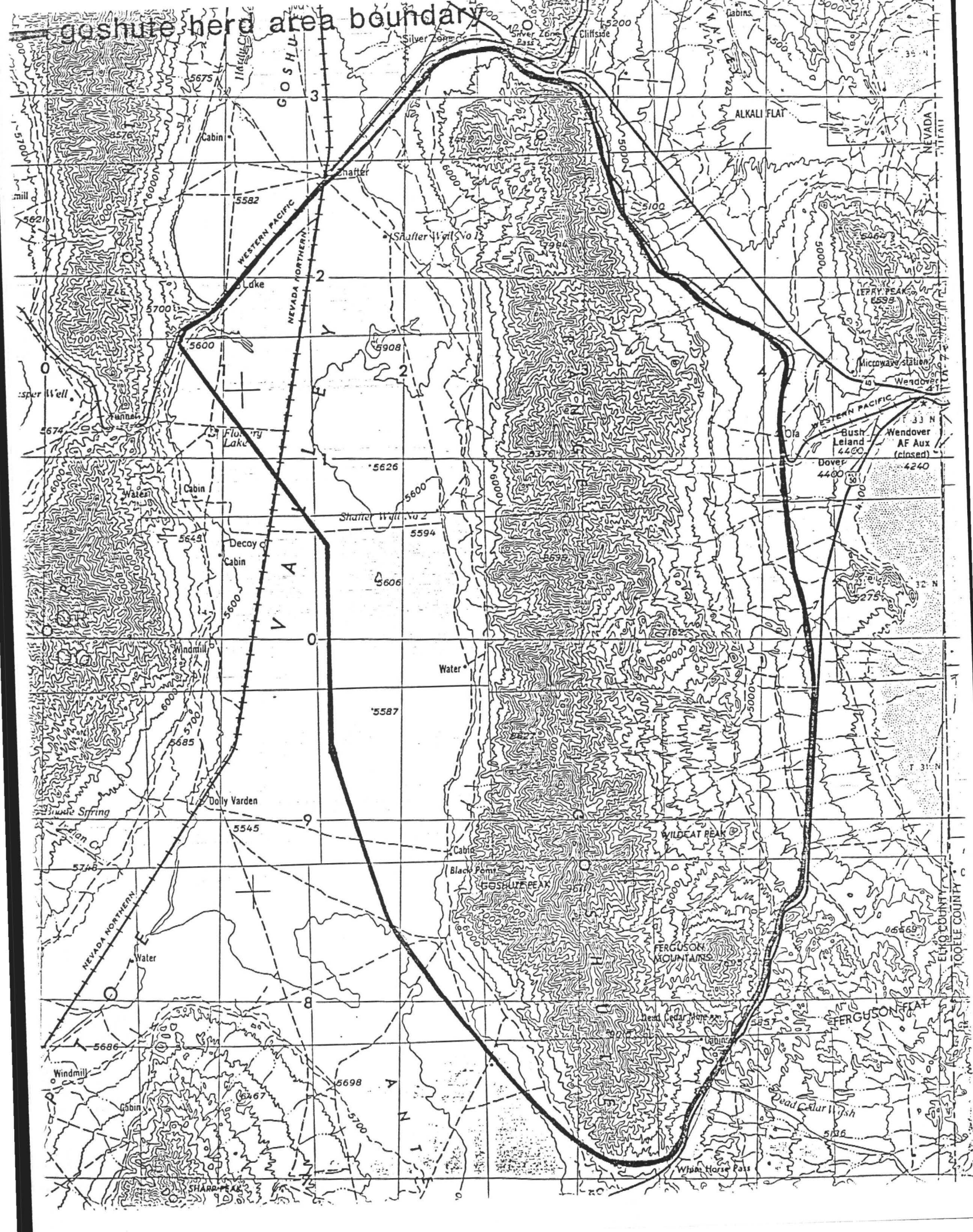
UNITED STATE DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

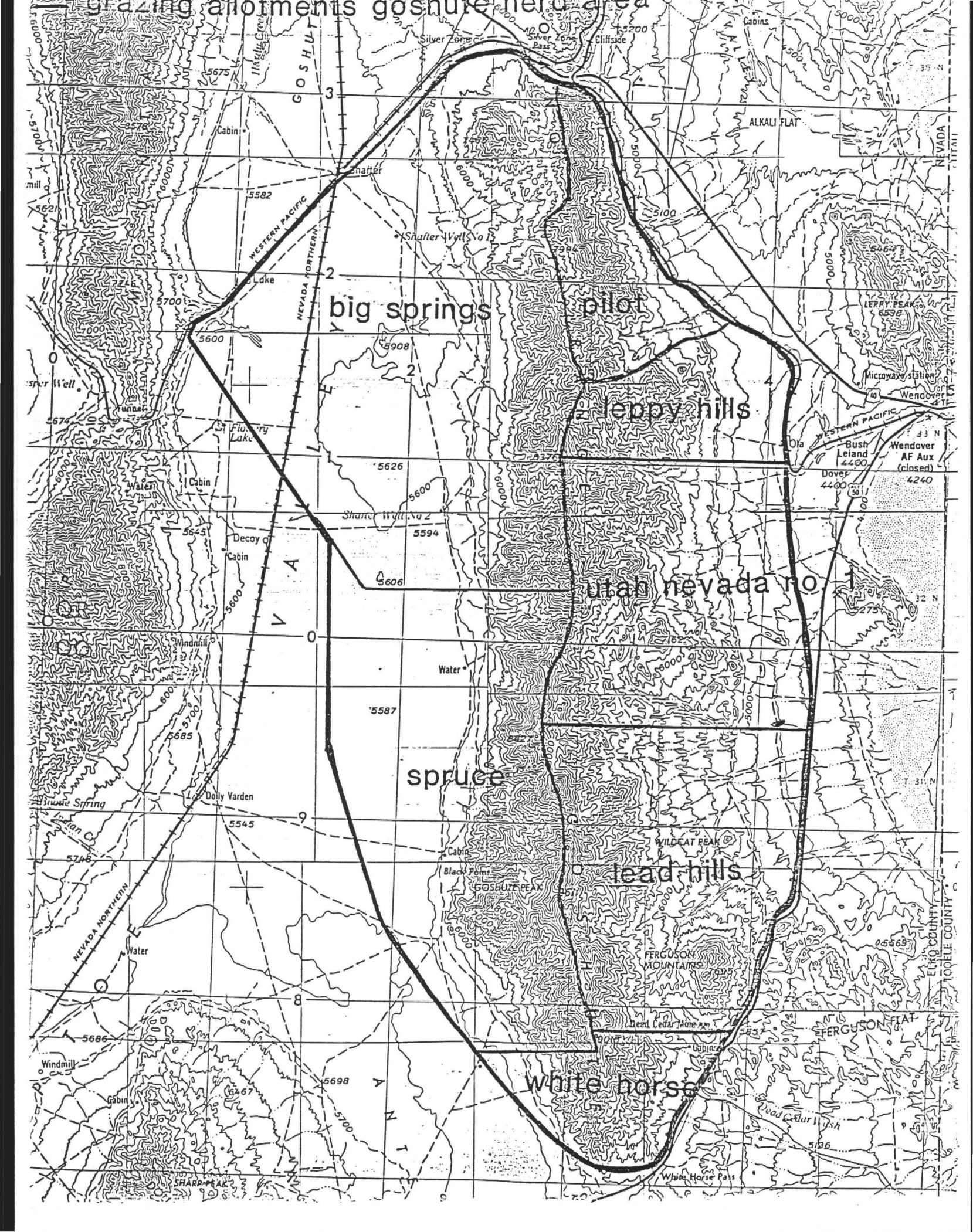
ELKO DISTRICT, NEVADA

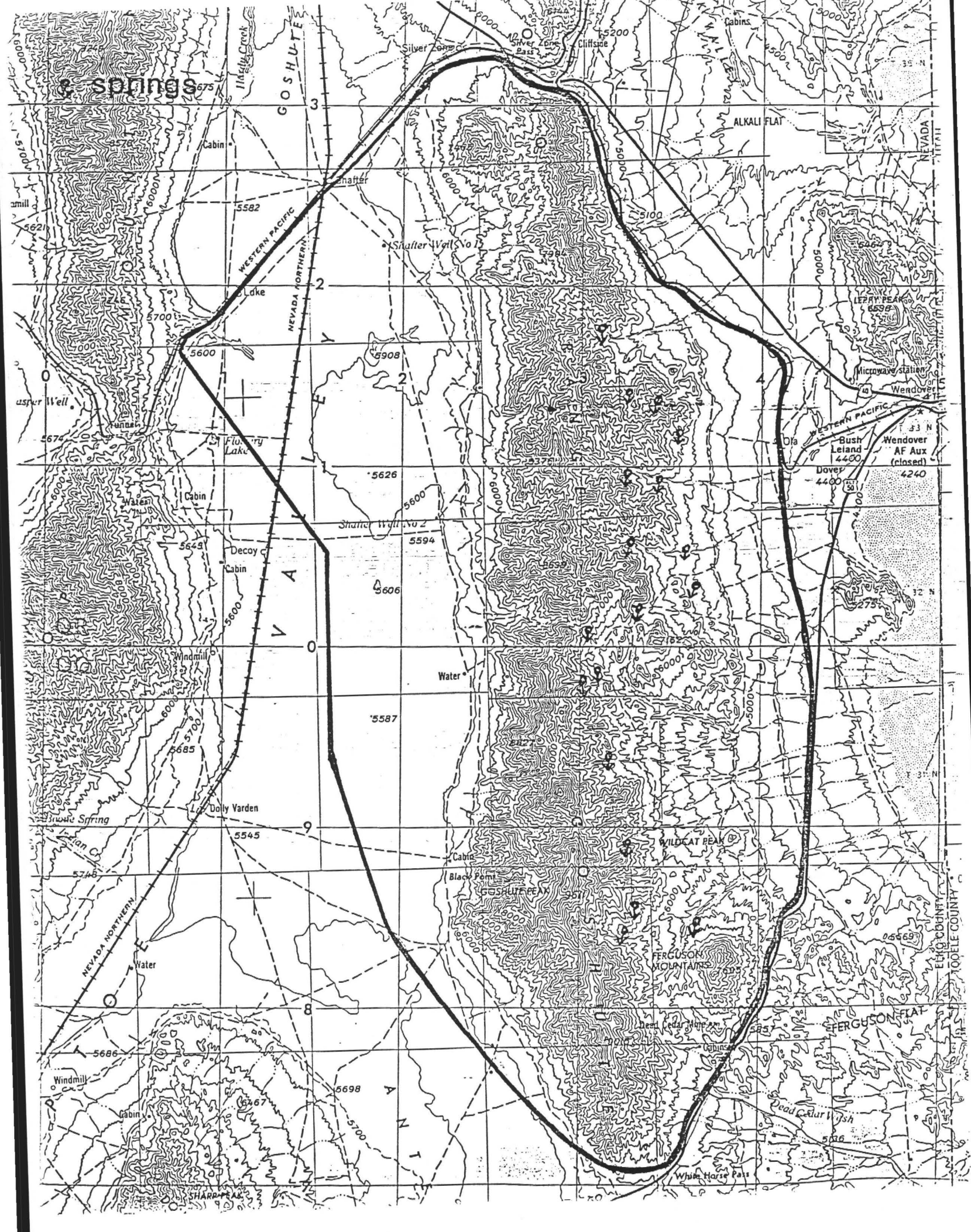


AREA REFERENCE MAP

AREA MAP
goshute herd area



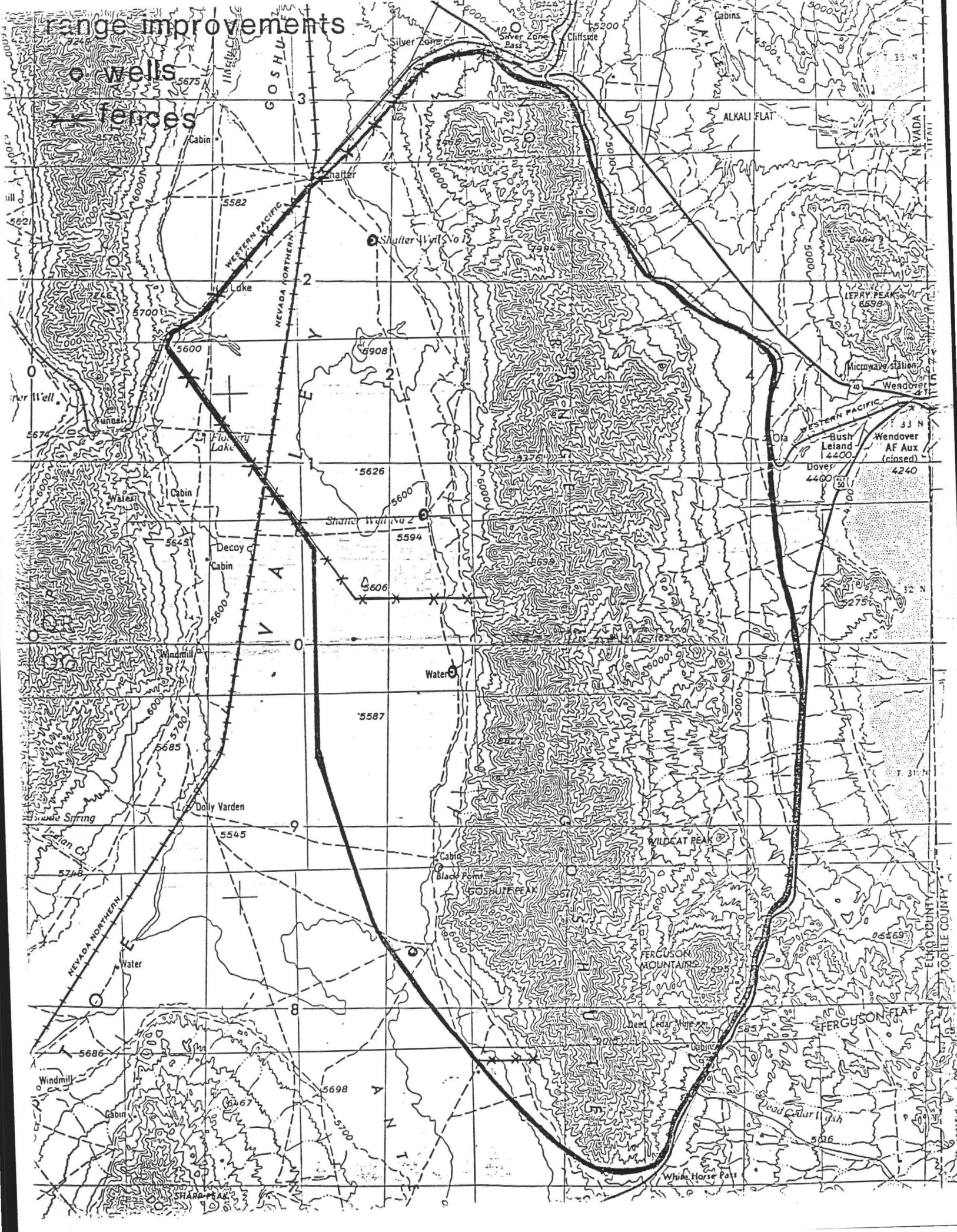




range improvements

o wells

— fences



ENVIRONMENTAL ASSESSMENT NO. NV-010-9-051
GOSHUTE HERD MANAGEMENT AREA (HMA)

I. DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES PROPOSED ACTION

A. Proposed Action

The proposed action consists of implementing the Goshute Wild Horse Management Area Plan (HMAP) for management of the wild horse herd within the Goshute Herd Management Area (HMA) (see attached map). Management objectives and management actions needed to accomplish the objectives are described in the HMAP. Site specific environmental analyses will be done prior to construction or development of any projects/improvements proposed within the plan including wild horse removals.

B. Alternatives

1. No Action

The proposed action was developed as a result of the Wells RMP-ROD which stated that HMAPs would be developed for each herd area. Therefore the only other alternative considered is no action. Consideration of 100 per cent implementation of the proposed action and consideration of no action will allow consideration of the full range of impacts.

Under the no action alternative the BLM would not approve or implement the Goshute HMAP. No action would not be in conformance with the Wells RMP-ROD which says that HMAP's will be developed to coordinate management of wild horses and implement wild horse management decisions. Therefore, the no action alternative will not be considered further.

II. AFFECTED ENVIRONMENT

The affected environment is described in the attached HMAP.

III. ENVIRONMENTAL IMPACTS

A. Proposed Action

There would be no initial impacts from the proposed action to wilderness values; areas of critical environmental concern; wild and scenic rivers; floodplains and wetlands; prime or unique farmlands; visual resource management; threatened or endangered animals or plants; or cultural, historical and paleontological resource values. As stated previously, site specific environmental analysis will be done for any provisions of the plan which contemplate ground disturbing activities. The above-listed resources will be considered in these individual environmental assessments.

1. Riparian Areas

Improved management and distribution of wild horses in the HMA, as well as maintaining wild horse numbers at prescribed levels, would lessen grazing and trampling at waterholes and riparian areas. This would contribute to a more favorable riparian habitat.

Social and Economic Values:

Positive management and maintenance of wild horse numbers at a viable herd level could bring vicarious pleasure to wild horse advocates. If it is perceived by advocates of wild horses, wildlife, and livestock that all forage users are benefitting equally or proportionately from the forage within the area, this would help public relations with the BLM plus ensure a more viable management plan. Better management of the Goshute herd would please local sportsmen and livestock operators. Lifestyles of residents would not be impacted. There would be an economic benefit to private contractors for maintenance gathers to keep the wild horse herd at appropriate management levels (AML). *what is meant*

2. Water (Drinking/Ground/Quality)

Water resources would be enhanced by the proposal. Maintaining wild horse numbers, better distribution and management of the horses would result in a greater quality of water resources in the plan area. Competition among wild horses, wildlife, and livestock for limited water supplies would be less. Springheads would thus not be trampled as heavily as at the present. More intensive management of the utilization of the forage through monitoring could likely result in a lessening of erosion and improvements in water quality. *IBLA*
justice

3. Air Quality

Minor temporary increases in air pollution from dust and exhaust fumes associated with wild horse gather operations would occur. Impacts would be temporary and dissipate quickly. Any increase in effective ground cover from vegetation protection and proper distribution of grazing would lessen air pollution from wind borne soil.

4. Wild Horses and Burros

The HMAP would provide a framework for control and positive management of the Goshutes wild horse herd. Proper management would provide for a healthy, viable herd.

wells that are turned off included?
All waters in the HMA will be available to wild horses. Those springheads and wetlands which are protected from wild horses will still provide water outside of the enclosures for wild horses and other purposes. Water availability, in general,

will enhance wild horse distribution within the HMA. This will also result in more even utilization of the available habitat and forage by wild horses.

The wild and free roaming characteristics of the wild horse herd would not be affected. Fences are not currently a problem and no new fences are proposed within the herd area. Any fences proposed would be designed in such a manner as to not interfere with normal daily or seasonal movements of wild horses.

Through the management plan there will be valuable knowledge gained from studies and monitoring to better understand population dynamics of this herd. The wild horse population recruitment rate should increase in response to improved habitat conditions and lessened competition.

5. Soils

The effective ground cover would be improved in parts of the HMA through proper distribution of grazing. Effective ground cover would decrease soil erosion.

6. Vegetation

The proposed action would result in improved forage condition and apparent trend throughout much of the HMA, especially in areas which have been identified as being in a downward trend.

The maintenance of wild horse numbers at AML would positively impact the vegetative community of the area. Ecological condition of the different plant communities would improve from decreased grazing pressure and better animal distribution. The more desirable grasses and shrubs would not be utilized as heavily. Production of these species would increase, as would their percentage of composition within the community.

Improved range condition and/or carrying capacity are expected to be achieved from the better distribution of grazing animals. This will result in a more uniform utilization of the forage and thus reduce areas of overutilization. The invasion of undesirable grasses and forbs would not be as great under the proposed action. Decreased grazing pressure would slow downward trends in overall range condition and would improve the ecological balance and multiple use relationship of the area. *demonstrate w/ data how it is not thriving*

A short-term negative impact would occur as a result of gather operations. Vegetation in the gather area would be severely trampled by the concentration of horses in the trap/holding corral areas. The impact would be only minor, since the impacted areas would be small in relation to the overall area. Vegetative regeneration would also be expected within 2 to 3 years, depending on climatic conditions.

7. Wildlife

A minor negative impact to wildlife is expected from gather operations. Some animals could become temporarily frightened or displaced by the increased activity during the removal operation. Implementation of the HMAP would provide protection for crucial wildlife habitat, and allocate a share of the forage to wildlife and expand and enhance suitable habitats. It is anticipated that there would be an overall net improvement in quantity and quality of forage. This would result in a beneficial impact to most species of wildlife.

now?

8. Recreation

Impacts to recreation would be minimal. Viewing of horses in the Morgan Basin Area of the HMA will continue. Some camping occurs in this area also and is likely to continue.

9. Livestock Grazing

The proposed action would have a beneficial impact on livestock grazing. Management of horses at prescribed numbers will reduce competition for forage. This will in turn reduce grazing pressure on forage plans allowing them to regain vigor. There would also be less competition for available waters.

IBLA -

IV. PROPOSED MITIGATING MEASURES

No mitigation is proposed for the identified impacts within this environmental analysis. Specific mitigating measures will be developed in subsequent environmental analyses for project/improvement development, including wild horse removals, to lessen impacts from those proposals.

V. CONSULTATION AND COORDINATION

A. Intensity of Public Interest

The issue of wild horses and their management has been one of high public interest for many years. Prior to the passage of the first protective regulations in the 1950's, local area residents captured horses on a regular basis, generally to be sold for slaughter. As laws were passed and more publicity was attached to the issue, public concern became greater, both for and against protection of these animals. In recent years, groups have become very vocal for the total protection of wild horses with reduction in grazing pressure to be absorbed by livestock interests in the areas where the horses were found. Public interest continues but now also includes groups and individuals interested in wildlife and game resources.

Interest in the issue of forage allocation among advocates for wildlife, wild horses, and livestock exists on the national level through organized wild horse interest groups, humane societies, and

4

organized wildlife and livestock interests. On the local level, there is a high degree of interest from affected permittees and from sportsman's clubs concerned with allocating a portion of the forage resource to wildlife.

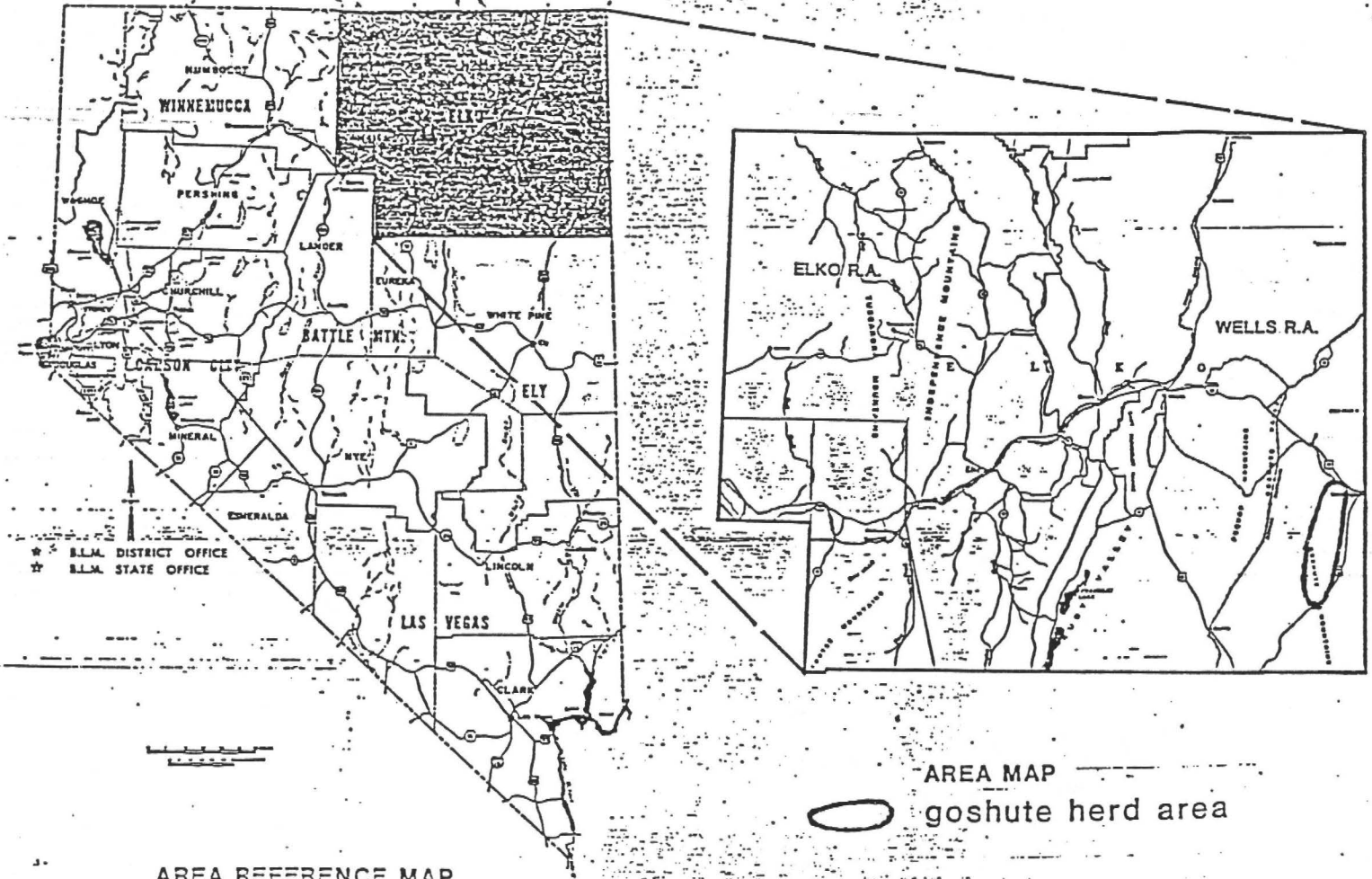
Since public interest is high and the wild horse program is of a controversial nature, public notification of the HMAP is being given and public comments are being solicited for a period of 30 days (see Record of Persons, Groups, and Agencies Contacted). Comments received will be considered for the final HMAP and environmental assessment.

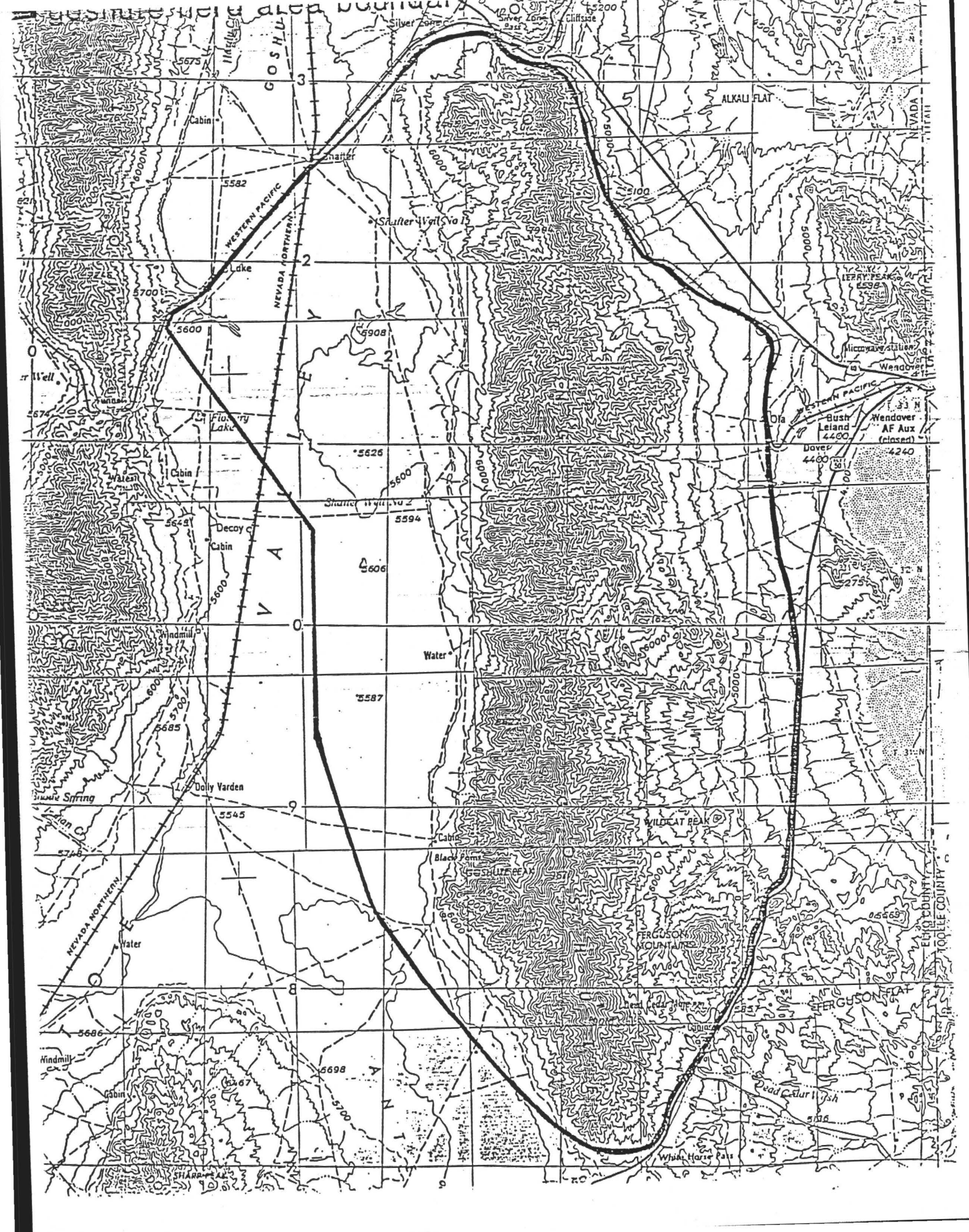
VI. RECORD OF PERSONS, GROUPS, AND AGENCIES CONTACTED

Ms. Deborah Allard
American Bashkir Curly Register
American Horse Protection Association
American Humane Association
American Mustang and Burro Registry
American Wild Mustang and Burro Foundation
Animal Protection Institute of America
Bureau of Land Management, Nevada State Director
Commission for the Preservation of Wild Horses and Burros
Mr. Craig C. Downer
Fund for Animals
Humane Society of Southern Nevada
International Society for the Protection of Wild Horses and Burros
Mr. Donald Molde
Ms. Tina Nappe
National Mustang Association
National Wild Horse Association
Nevada Cattleman's Association
Nevada Federation of Animal Protection Organization
Nevada Humane Society
Nevada Wildlife Federation
Ms. Amanda Rush
Save the Mustangs
Ms. Nan Sherwood
Sierra Club, c/o Ms. Rose Strickland, Public Land Committee of the Toiyabe Chapter
U.S. Fish and Wildlife Service, Attn: Mr. Bob Hallock
U.S. Humane Society
Mr. John Walker, Nevada State Clearinghouse Coordinator
Wild Horse Organized Assistance
United States Wild Horse and Burro Foundation
Barbara Eustis-Cross

UNITED STATE DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

ELKO DISTRICT, NEVADA





7/27/89

BOB MILLER
Acting Governor

STATE OF NEVADA

TERRI JAY
Executive Director



**COMMISSION FOR THE
PRESERVATION OF WILD HORSES**

Stewart Facility
Capitol Complex
Carson City, Nevada 89710
(702) 885-5589

COMMISSIONERS
Deloyd Satterthwaite, Chairman
Spanish Ranch
Tuscarora, Nevada 89834

Dawn Lappin
15640 Sylvester Road
Reno, Nevada 89511

Michael Kirk, D.V.M.
P.O. Box 5896
Reno, Nevada 89513

July 27, 1989

Rodney Harris, District Manager
BLM - Elko District Office
3900 E. Idaho Street
P.O. Box 831
Elko, Nevada 89801

Dear Mr. Harris,

Thank you for permitting me to comment on the Draft Goshute Herd Management Plan and associated Environmental Analysis.

I would like to know why you have not used the Wild Horse and Burro Habitat Evaluation Procedures Users Guide in preparing the draft HMAP. Even though the users guide is in draft form, it is being used in other districts.

I feel this is important and should be assimilated into your HMAP to protect critical habitat for the wild horses.

I would also like to know how you can manage animals if you don't know WHY they use a particular area, or why they use a specific species of plant?

In light of the recent ruling by IBLA, please provide the necessary data that shows how horses are impacting a "thriving ecological balance" in the herd area, and how you can justify any removals or maintenance of any specific "appropriate management level."

On page 5 of the HMAP, you state that 452 horses were claimed. Were all of these horses branded as required by the state brand laws? If the horses were not branded, was the claimant fined for failure to brand? Were the claimants assessed trespass fees for the non-permitted horses? How was the determination made that these horses were not wild and free-roaming?

Please provide me with the documentation (ie: copies of registration papers, brand inspections, etc.) that shows the claimed horses were "owned" horses.

On page 9, you conclude from your data that you have a stable population, yet your next sentence states you have a 9% rate of increase. Which is valid?

Rodney Harris
July 27, 1989
Page 2

Also, on page 9 you state that wild horse forage conditions are good with a good variety. If conditions are good, and the herd is over the AML, then the range is obviously in a "thriving ecological balance" and future reductions may not be necessary.

On page 10, you justify holding the AML at 96 to 120 horses through the Wells RMP.

As stated previously, the IBLA ruling would preclude holding at any specified number. The horses should be managed at a "thriving ecological balance."

On page 12, your objectives are to "Provide 1440 AUM's of forage for wild horses..." Were the AUM's adjudicated in the Wells RMP?

In B. Animal Objectives - what is meant by "actual use" by horses? Also on page 12, under "Management Methods," you state that the horse population will be maintained at the AML. I again refer you to the IBLA ruling and suggest your management be in accordance with that ruling.

On page 13, 2. b., you discuss "proportionate adjustments" in forage and you use the AML to base the adjustments on. This is no longer applicable as per IBLA, so horse numbers and adjustments must be made on a "thriving ecological balance."

Also on page 13, you state that water developments are needed for wild horses. The Commission would be very interested in looking at providing funding for any or all of these projects.

If you have costs estimates for these projects, please forward them to the Commission office for review. I would be more than happy to work with a member of your staff on developing a grant proposal.

Again, on page 15, you attempt to justify removals based on the AML. The IBLA ruling has made this an invalid justification.

At the bottom of page 15, you state that the horse program is a "relatively new program." If the program was a person, it would be old enough to VOTE!

Page 16, B.1., No justification for maintaining at AML.

In the EA - No. NV-010-9-051, on page 2, you state that "Better management of the Goshute herd would please local sportsmen and livestock operators." What is meant by "Better Management?" Further reductions? Better for the horses or better for the sportsmen and livestock operators?

Rodney Harris
July 27, 1989
Page 3

Also, same paragraph, last sentence, IBLA ruling applies.
Page 2, "Water" - no justification for "maintaining" wild horse numbers.

Page 2, 4. - Wild Horse and Burro - "All waters in the HMA will be available to wild horses". Does this mean that all wells will remain turned on year-round?

Page 3, 6. - There is no justification for "maintenance" of wild horse numbers at AML. In the third paragraph, you state that "Decreased grazing pressure... would improve the ecological balance..." Please provide the monitoring data that demonstrates this.

On page 4, 7. Wildlife - How will implementation of the HMAP allocate a share of forage to wildlife? Wasn't this done in the RMP?

Also on page 4, 9. Livestock Grazing - Please provide your justification for management of wild horses at "prescribed numbers" in light of the IBLA ruling.

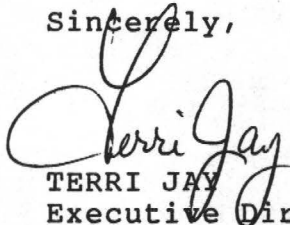
In conclusion, I feel that implementation of the draft HMAP as presently written, would be in violation of the IBLA ruling.

I also believe that it is extremely important to have the site specific data on the wild horse herd area as required in the Habitat Evaluation Procedures Users Guide, BEFORE you develop a herd management area plan. Habitat must be evaluated as an integral part of any HMAP.

I look forward to hearing from you further in this matter.

Thank you for your time.

Sincerely,



TERRI JAY
Executive Director

TJ/cb

7/7/89

WHOA!

live feed

BOARD OF TRUSTEES
 DAVID R. BELDING
 JACK C. McELWEE
 GORDON W. HARRIS
 BELTON P. MOURAS
 GERTRUDE BRONN, Honorary
 In Memoriam
 LOUISE C. HARRISON
 VELMA B. JOHNSTON, "Wild Horse Annie"

WILD HORSE ORGANIZED ASSISTANCE
 INC.
 A Foundation for the Welfare of
 Wild Free-Roaming Horses and Burros

P. O. Box 555
 Reno, Nevada 89504
 Telephone 323-5908
 Area Code 702

July 7, 1989

Mr. Rodney Harris, District Manager
 Elko District Office
 P.O. 831
 Elko, Nevada 89801

Dear Mr. Harris:

Thank you very much for sending WHOA a copy of the draft herd management plan and associated EA. We appreciate the opportunity to comment.

DRAFT GOSHUTE HERD MANAGEMENT PLAN

II. A Relation to Planning Document, page 1, paragraph 1

"..[P]roblems identified in the RMP included those associated with construction of fences which would pose barriers to horse movement and poor distribution of water sources."

COMMENT:

I have researched the Elko RMP "issues and planning criteria" and find no reference to poor distribution of water. In the RPS, 9/15/86 at 6, it states "...construct six water development projects for wild horses." It also states, page 2 at 5, "...monitor wild horse populations and habitat conditions; maintain populations within a range of 550 to 700 animals."

Your information and maps indicate that wild horses "summer" on the eastside of the Goshute Range; the map "springs" indicates at the present a good distribution of water on their summer ranges when they need it. Are your planned developments for wild horses planned for the east side of the Goshute? Are they spring rehabilitation? Or are the developed waters really to distribute wild horses, especially in light of your (96-120) greatly reduced numbers, or are they more to distribute livestock? Why would the developments be necessary with the few horses? wonder how

