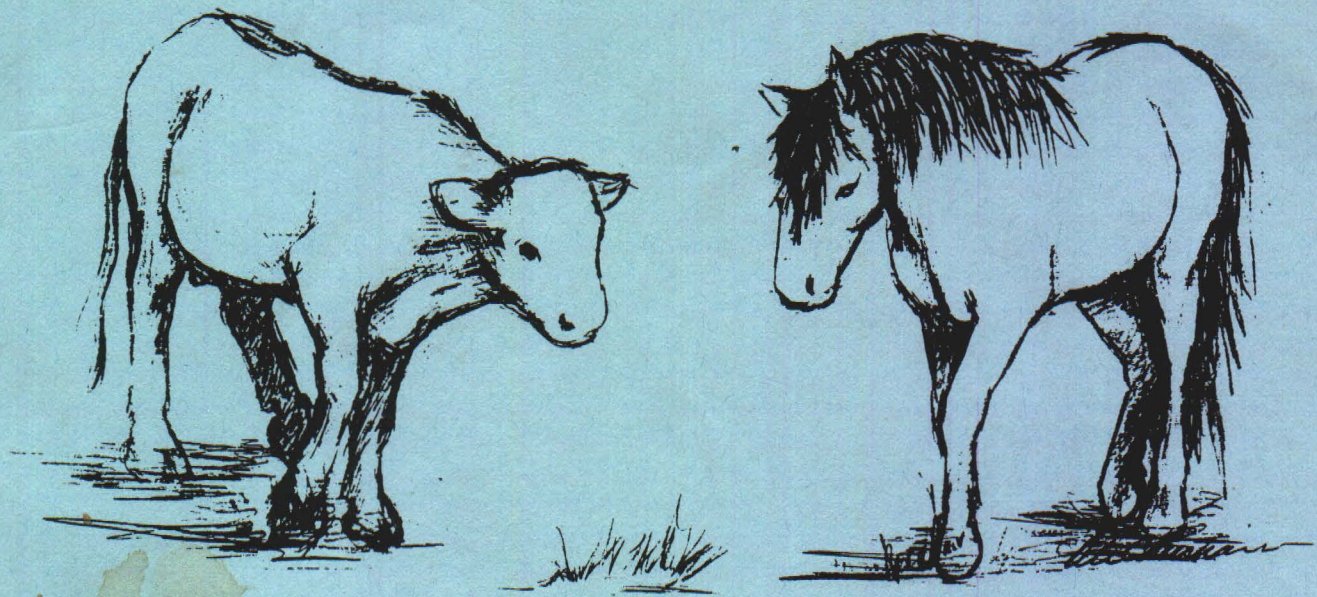


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REPORT OF THE REVIEW TEAM ON FORAGE
ALLOCATIONS FOR WILD HORSES AND LIVESTOCK

October 1994



EXECUTIVE SUMMARY

Wild horse groups have raised an issue over their perception that as reductions in grazing animals are made to balance numbers with the forage carrying capacity, the common practice in the Bureau is to remove actual horses but only "paper" cows.

A team was asked to review a sample of Districts to determine the degree of consistency or inconsistency among Bureau offices in the way in which forage allocation decisions are made, documented and implemented. The team made site visits to eight Districts in Utah, Idaho, Wyoming and Nevada.

The team found that there is a considerable amount of variation in the way allocation decisions are made and documented, particularly between Nevada and the other three states. Nevada uses a Multiple Use Decision (MUD) process which follows development of Resource Management Plans (RMPs) and implements the objectives of the RMPs. The other states use the RMP process (or updates of earlier Management Framework Plans) to determine wild horse and livestock numbers.

The team found a consistent pattern among all states in the way reduction decisions are implemented. Once the decision is made to reduce both wild horses and livestock, the reduction for wild horses almost always constitutes a real reduction in the number of wild horses on the range while the reduction in livestock is first taken from the permit preference level rather than actual livestock numbers. On the other hand, the general trend from the early 's to present appears to be an increase in the target number of horses and a static or slightly declining number of livestock.

Team recommendations include the following:

- * Forage allocations should be directly tied to land use planning
- * All reasonable alternatives should be explored with full public involvement and compliance with NEPA
- * Emphasis should be given to the result, not an arbitrary formula for making forage allocation decisions
- * Ails should be ranges rather than specific numbers and reports should summarize the totals for both the minimum and maximum
- * The Bureau needs to take a look at the practical effect of reliance on monitoring
- * Better information is needed for calculating AUMs for horses

all herbivores

*no "TARGET" #
censuses at time*

Yes!

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REPORT OF THE REVIEW TEAM ON FORAGE ALLOCATIONS TO WILD HORSES

I. INTRODUCTION

Since its inception, the wild horse and burro program has been controversial. Prior to 1971 and the passage of the Wild Free-Roaming Horse and Burro Act, it was pretty much open season on wild horses and burros on the public lands of the west. Intermittent roundups by ranchers and others kept numbers in check and numbers of horses versus numbers of livestock was seldom an issue. In the range adjudications of the late '50s and '60s the allocation of forage to anything other than livestock was almost never attempted. However, with the passage of the Act, the Bureau of Land Management (BLM) was mandated to maintain appropriate numbers of horses and burros on the public lands. This meant that for the first time the agency had to make explicit decisions about future numbers of both wild horses and burros and livestock where there was joint use by both.

The early attempts to control numbers of wild horses through roundups or gathers were challenged by wild horse advocacy groups on the basis of a lack of documentation on the extent of the available forage resource and inadequate information on present and desired future numbers of wild horses. Advocacy groups often viewed agency attempts to control numbers as a threat to the existence of the wild horses and as bowing to the political pressure exerted by livestock permittees. As BLM implemented land use planning in the '70s, the decision process on how to deal with the apparent conflict over the use of a finite forage resource became more structured and provided for more public involvement in the process.

However, the evolution of a more structured process did not settle to the satisfaction of all the sense of fairness between the number of horses and the number of livestock that both can and should be supported on the public ranges. In general, wild horse advocacy groups want more horses (or at least no fewer) and the livestock interested want fewer horses. As decisions are being made in more and more land use plans, the wild horse advocacy groups believe that a consistent and disturbing trend is becoming apparent, i.e., actual numbers of horses were being removed while reductions on the livestock side amount to removal of only "paper" cows.

The wild horse advocacy groups have now raised the issue of fairness and equity and are challenging the manner in which the allocations of forage are being made between wild horses and livestock. While this may also be an issue in those areas where there are significant numbers of wild burros, the current issue is being raised by wild horse interests and our discussion is,

* Livestock
permittees

THIS IS
NEVADA ONLY
SINCE OTHER
STATES MANAGE
DIFFERENTLY

therefore, limited to wild horses and livestock, usually sheep or cattle.

Because there are a number of different methods which can be used to arrive at and implement forage allocation decisions, a team was established to document the variables involved, particularly those actions which affect how and when forage is allocated among livestock and wild horses. The team was led by Dave Little, Vernal District Manager, and included Gerald Smith, Ely District Office; Kris Eshelman, Wild Horse and Burro National Program Office; Ken Harrison, Utah State Office; David Aicher, Humboldt National Forest; and Cathy Barcomb, Nevada Wild Horse Commission.

The team was requested to gather information on the present situation from a cross-section of Districts and then to prepare a summary report. The approved study plan for the review was transmitted to the field in Information Bulletin WO-94-___ and is included in this report as Attachment 1. The team was asked to:

1. Determine the basis being used for establishing the forage carrying capacity, i.e., the specific range survey, monitoring studies, etc.
2. Identify the methods and techniques for allocating forage among competing uses, i.e., historical use patterns, active versus non-use, public or other agency recommendations, etc.
3. Document the vehicles for actually putting those determinations into effect, i.e., land use plans and/or amendments, grazing decisions, allotment management plans, herd management plans, multiple use decisions or some other documented process.
4. Document the practical effect of implementing the decisions in terms of the actual number of wild horses and/or livestock actually removed from wild horse herd management areas. To the extent that data are available, plot the historical trend of wild horse and livestock numbers for at least several representative herd management areas.
5. Summarize the degree of consistency or inconsistency among offices and states.

Team members visited eight different districts in four different states as follows:

Cedar City and Richfield Districts - Jerry Smith and Cathy Barcomb

Boise and Winnemucca Districts - Kris Eshelman and David Aicher

Elko and Ely Districts - Ken Harrison

Rock Springs and Rawlins Districts - Dave Little

Team members interviewed managers and staff in each district and reviewed land use planning documents, wild horse herd management area plans, herd management area evaluations and other available material to gather information relative to the five broad categories above. A summary writeup for each of the site visits is included in this report as Appendices 2-5. The team found personnel at all offices very open and helpful and a universal intense interest in the outcome of this forage allocation review.

The team then convened in Reno, Nevada on September 12-14, 1994 to share the information gathered and to prepare this team report.

II. APPROPRIATE MANAGEMENT LEVEL

The term "appropriate management level" (AML) as it applies to target numbers of wild horses has been with BLM since the origins of the Act in 1971 but there are significant differences in the way the term is being applied. The review team feels that some discussion of the background and application of AMLs is essential to understanding the perceptions on the forage allocation issue.

Until recently most offices have interpreted the AML as the maximum number of horses allowed on the range and derived the number from counts or estimates performed shortly after the act was passed. Several offices now use the AML as the average number of horses to be maintained over some designated period of time. This is basically the midpoint between a minimum population level and the maximum tolerable before deterioration of resources occurs. The team found no situations where an AML was defined as the minimum population.

In most of the sites visited, the AML numbers have held relatively constant even through the 1990's when wild horse interest groups challenged the basis for these numbers. In some areas AML numbers have increased slightly. In Nevada most of the AML's are based on census or estimates of animals performed in the early 1980's.

incorrect

As long as the term is accurately defined for each area and then is applied in a way that is consistent with the definition used, the variation in the definitions used for the AML do not directly impact the forage allocation issue. However, the differences in meaning do have a bearing on the understanding that BLM personnel and the public have on the numbers of wild horses for which the Bureau is managing. For example, differing definitions affect the accuracy of the National Report because if some AMLs are averages whereas others are maximums, inferences about the total number of horses on the range are impossible to determine.

A secondary issue relating to AMLs is the differing ways offices count differing ages of wild horses toward the official count. This difference results both from philosophical differences of when an animal should first be counted as well the differing times of

the year when counts are made. Note that the regulations at 43 CFR 4130.7-1(c) establish that, for the purposes of calculating grazing fees, all livestock over six months of age are counted unless they were less than six months old at the time of entering the public lands and will not become twelve months of age during the authorized period of use.

III. THE FORAGE ALLOCATION DECISION PROCESS

The regulations in volume 43 of the Code of Federal Regulations governing both administration of livestock grazing (subpart 4100) and management of wild horses (subpart 4700) tie decisions in these programs to the Bureau's land use planning requirements (part 1600). Quotations from the portions of the regulations and BLM Manual on planning relevant to the allocation issue are included in this report as Appendix 6.

Both the livestock and wild horse regulations assume: (1) that there is a land use plan in effect, (2) that a determination of carrying capacity has been made, (3) that a decision has been reached on the appropriate numbers of animals and (4) that subsequent management will then be consistent with decisions in those plans.

Although the regulations set out broad guidance for the types of decisions to be made in the land use plans, there is only one statement in the wild horse regulations that even indirectly provides some policy direction on how allocation decisions are to be made for competing use of the available forage resource by livestock, wild horses and other uses. At 43 CFR 4700.0-6(b) the policy states: "wild horses and burros shall be considered comparably with other resource values in the formulation of land use plans".

From the team's review of documented decisions on the forage allocation issue, it is apparent that there is a wide variation in the way the forage allocations have been made as well as in the type of document that establishes the allocation decision. During the reviews the team attempted to establish for each District and Resource Area visited the basis for the allocation, the general approach applied and the method of implementing the decision. These are described in each of the individual District reports included in Appendices 2-5 and are summarized below.

A. Basis for Forage Allocation Decisions

Wild Horses:

In the Resource Areas visited there appears to be primarily three general bases for establishing target wild horse management levels in land use plans (LUPs). These were a census at one point in time (usually either 1971 numbers or the population when the LUP was developed), an agreement between affected parties and BLM and by court order. In some Resource Areas a combination of these were used.

The basis used for each area depended upon the unique circumstances in effect at the time the decision was made. For example, in the Rock Springs District a court suit brought by the Rock Springs Grazing Association concerning wild horses on the "checkerboard" lands led to a negotiated AML that then became a part of the court order. In other districts there were negotiations with counties over numbers or agreements with livestock operators and others on target numbers. In some cases, these early agreements are still in effect while in others they have been superceded by more recent decisions.

Livestock:

The basis for livestock allocations in all land use plans was more consistent among Districts. They commonly used either the existing active preference or the average actual use of livestock over a specified period of time prior to the completion of the LUP. These were usually considered goals or objectives for livestock use to be subsequently adjusted based upon the resource capability through monitoring data analysis, interpretation and evaluation.

B. Approach Used In Making Forage Allocations

Wild Horses:

All the states visited, with exception of Nevada, consider the management levels identified in the LUPs as the appropriate management level (AML) for wild horses and these AMLs are only be changed through a LUP amendment process. In Nevada, the management levels identified in the LUPs are not considered AMLs, based upon an interpretation of IBLA Decisions 88-591, 638, 648 and 679 decided June 7, 1989. The LUP identified management levels in Nevada are adjusted periodically through analysis of monitoring data to reach a thriving natural ecological balance within their Herd Management Areas (HMAs), taking into consideration all other resource uses.

Livestock:

The approach for livestock adjustments was consistent throughout all the states visited. A documented evaluation of the analysis of monitoring data is utilized to determine the needed adjustment in livestock use to balance with the carrying capacity of the natural resources. In all cases, any reduction in numbers of livestock resulting from a reallocation of available forage between livestock and wild horses begins with the active preference and continues until the established livestock carrying capacity is reached.

C. Method of Implementation

In those States where the approach is to establish AMLs in the LUP, the methods to implement adjustments to the AMLs are through amendments to the land use plan based upon new information. Wild horse numbers are held to within the established AML by the completion of gather plans and associated NEPA documentation. Livestock are adjusted through the issuance of tradition grazing decisions to make livestock use levels consistent with the established carrying capacity of the natural resources.

In Nevada, Multiple Use Decisions (MUDs) are utilized to adjust all herbivore numbers in accordance with the thriving natural ecological balance. MUDs are prepared subsequent to completion of LUPs and are based on the objectives established in the LUP and individual allotment monitoring and evaluations. They are a combination of decisions within one format that adjust livestock terms and conditions of permits, establish wild horse AMLs, and recommend wildlife management numbers and/or habitat management (see Attachment 7 for a general description of the MUD process).

IV. FORAGE ALLOCATION FOR WILDLIFE AND OTHER USES

In the collection of data for this study, the team has focused primarily on the division of forage among livestock and wild horses. The team, however, recognizes that from an ecosystem perspective any valid forage allocation must consider the total amount of forage available and all uses of the vegetative resource, including use by livestock, wild horses and burros, recreation, esthetics, watershed, wildlife, etc. Unfortunately, it was not always possible to find explicit, documented allocations of forage for each use. There may, therefore, have been an over allocation of the forage resource in some areas, but the team was not able to document this. *there is overallocation + it is documented / paper rous strategic plan no allocation to wildlife*

This is a particular concern where there is a significant use of the forage resource by wildlife. The manner in which forage allocations have been made for wildlife appear to vary widely depending upon the extent of the perceived conflicts with other

uses and the working relationship with the involved state wildlife agency. In some states the number of wildlife for which an allocation of forage is made is open ended and undefined while in others the numbers are jointly set by BLM and the state at some "reasonable" or "objective" level.

Within the context of allocation to wild horses, there are the additional problems of relating data for various kinds of wildlife herd units to data relevant to wild horse herd management areas. This is particularly difficult when considering such things as the degree of dietary overlap with horses, seasonal use patterns and breaking down geographically broader wildlife herd unit information into more site-specific livestock allotments or wild horse herd management areas.

In the team's review of the eight districts, there appears to be little consistency in the way forage is allocated to uses such as wildlife. In most areas, the local personnel did not feel that this was a problem because wildlife such as antelope and mule deer seldom appear to be a limiting factor in determining numbers of wild horses and livestock. However, in some site-specific areas use by wildlife is viewed as a significant issue because of such things as heavy use on browse in areas critical for winter survival of both horses and mule deer or where numbers of elk are increasing and prior planning did not allocate sufficient forage for elk.

V. RESULTS AND TRENDS

The review team attempted to document the effects of the Bureau's forage allocation decisions on wildlife, wild horses and livestock over time. Unfortunately, this is a very complex task and information in summary form is generally not available. The information in this section is, therefore, a combination of specific information gathered and the collective sense of the review team members resulting from personal knowledge and interviews and discussions with staff of the offices visited.

A. Wildlife

As the team reviewed the programs in the eight Districts in the four states used for the study, the reviews centered more on forage allocations for livestock and wild horses than on those needed to meet wildlife objectives. Generally, specific information on trends in wildlife numbers was not available, but most staffs felt that wildlife was not a major concern as a competitor for forage with livestock and wild horses.

Specific forage allocations for wildlife have been difficult because state wildlife management agencies typically have not set specific objectives for wildlife populations based on identified carrying capacities. They usually use "reasonable numbers"

obtained from wildlife counts, harvest data and professional estimates. There are few areas where state agencies can provide actual target population numbers tied to the forage capacity.

In the future, as wildlife conflicts increase, the Bureau will be forced to more explicitly incorporate forage use by wildlife in its decisions. This is especially true for elk because they directly compete with both wild horses and livestock for forage and their numbers in some areas are significantly increasing because of planned reintroductions, natural population increases or migrations from existing elk herds.

B. Wild Horses

Data for a good analysis of trends in wild horse numbers on the public lands since 1971 are impossible to get. Estimated population numbers in the early '70s were derived from a combination of census data and "best guess". There were also problems associating numbers of wild horses with specific use areas. The designated herd management areas (HMAs) were established using the initial "one-point-in-time" census surveys and often did not take into account migration and seasonal movement of the animals which has in later years resulted in movement out of the established HMA's. The confidence in the estimations on numbers of horses has improved as experience and accuracy in census techniques has increased.

During the '70s, the general Bureau trend in decisions for wild horse numbers was to maintain their populations at the estimated 1971 census levels. As populations increased, little or no action was taken to adjust the numbers which then fluctuated widely due to budgetary constraints, appeals, memorandums of understanding (MOUs) and, more often than not, political pressures. The result of this was that as the AMLs were established they usually remained the same as the initial management target while the actual populations of wild horses significantly increased.

In the early '80s, the wild horse target numbers were reestablished through land use planning such as revisions of existing Management Framework Plans or preparation of new Resource Management Plans or through Coordinated Resource Management Plans, Multiple Use Decisions, social/political negotiations or court established numbers. Since there had been little direction on or budget for gathers previous to this, wild horse numbers were higher than the established AMLs because of the natural increases in the populations. As the new AMLs were being established, they were usually based on the then current early '80s census information as opposed to the original '70s numbers. In general, in the states reviewed, this has resulted in the target numbers of wild horses increasing to varying degrees.

In Utah, Wyoming and Idaho, the numbers established in the land use plans of the early '80s have been "written in blood". With very few exceptions, the numbers established in those plans have been managed for and maintained at that level. Again, budgetary constraints, appeals, court orders, MOUs, politics and social economics have influenced wild horse captures and removals and the actual numbers of wild horses on the range.

In Nevada, however, the numbers established in the early '80s were maintained at that level only until 1989 when a series of IBLA decisions mandated that numbers be established for a "thriving natural ecological balance" (WHATEVER THAT MAY BE!) rather than on an administratively determined number. Nevada now, therefore, uses a Multiple Use Decision (MUD) to determine the specific objectives for wild horse numbers in a herd management area (see the section on the Decision Process and Appendix 7 for descriptions of Nevada's MUD process). The MUD for each wild horse herd management area is completed following preparation of a Resource Management Plan and subsequent monitoring and evaluation. This is intended to be a continuing process whereby new monitoring data will be used to periodically update the forage allocation decisions on numbers of wild horses and wildlife. ^{livestock}

With the use in Nevada of the MUD process and with the trend that five years of monitoring and data is necessary to adequately evaluate range condition, many proposed gathers in Nevada were appealed and stopped for controversial reasons or because of a lack of data collected. This "moratorium" on gathering horses allowed the numbers in Nevada to increase dramatically and then to decrease as MUDs were completed and gathers were reinitiated. The total number of wild horses in Nevada provided for in the '80s land use plans was about 20,000 horses. Since the 1989 IBLA decisions, that number grew to an estimated 45,000 horses and has subsequently decreased with drought, severe winter conditions, lack of available forage, rustling and the push to gather excess horse to reach the planned AMLs to a current (hot-off-the-press) population level of about 27,000.

Another difference between Nevada and the other states with much smaller populations of horses, is that the Nevada plans of the '80s based on census information were used to set proportions (percentages of use) between livestock (usually existing preference) and numbers of wild horses. As previously discussed, the numbers of wild horses censused may not have been correct in some HMAs due to the learning curve in applying census techniques and failure to fully recognize seasonal movements, etc. The proportions of wild horses versus livestock set for some HMAs, therefore, may not have been correct and may still not be entirely accurate which may now result in inaccurate decisions and proportional or percentage reductions coming out of the MUDs.

Over-allocation of the available forage has also resulted from the application of the Bureau's Strategic Plan for Wild Horses and Burros by not removing animals down to the identified AML. The Strategic Plan dictates that age and adoptability, not range condition, be the deciding factor in how many horses are removed and how many are released back onto the resource. Where the herd contains a disproportionate number of older animals, there are not enough "adoptable" animals available to remove to get down to the AML. In some cases in Nevada, unadoptable horses have been known to be released back to certain death from lack of either forage or water...again, age and adoptability being the criteria, not carrying capacity.

C. Livestock

The actual number of livestock authorized to graze on allotments that overlap wild horse herd management areas is believed to have remained essentially the same over the past twenty years, but there has been some variation among the states reviewed. Factors such as politics, socio-economics, the negotiation process, various kinds of agreements, coordinated resource management plans, memorandums of understanding, court decisions, etc., have often led to allocation of uses rather allocations based on the true capacity of the available forage resource. Livestock allocations based on existing livestock preference were usually set along with AMLs for wild horses.

In all states reviewed, it is common for operators who graze in areas shared with wild horses to be carrying a significant proportion of their grazing permit preference as nonuse, either voluntarily or by agreement with, or decision from, the Bureau. Reasons for nonuse vary with the operator and area, but often include either a recognition that there is not sufficient forage for both the present numbers of wild horses and the preference level of livestock grazing or the economics of the range livestock industry, or both. Economic reasons for nonuse particularly apply to the range sheep industry where there are depressed prices, difficulties with obtaining inexpensive labor and problems with predators.

Other problems with allocating forage to livestock are the result of conversions from sheep preference to cattle preference where in some areas the conversion allowed an even trade in numbers of animals rather than a conversion based on numbers of animal unit months (AUMs) used by each class of livestock. Sometimes the differing forage preferences or the physical suitability of the area based on type of vegetation, presence or absence of water and topography were also not fully considered. The result in these areas has been an over allocation of the forage and a corresponding decline in range conditions.

Although the decision process varies among states and districts, a common trend in all states reviewed is that in making adjustments, any reductions to livestock consistently come first from the preference level, not the historic levels of actual use.

Another problem perceived by the wild horse advocacy groups is that any adjustment in livestock AUMs from active use greater than 10% must, by regulation, be phased in over a five year period unless an agreement is reached with the affected parties to implement the reduction in less than five years (43 CFR 4110.3-3(a)). Where reductions begin at the preference level, the result has been that the number of mouths feeding on the range until the fifth year is still greater than the forage resource can support on a sustained basis or that provided for in the allocation decision. This is in conflict with regulations, policy and proper resource management (especially when considering principles of ecosystem management).

VI. CONCLUSIONS AND RECOMMENDATIONS

A. The Forage Allocation Process.

1. Conclusions:

The team was able to document significant differences in the approaches used to making forage allocations, but there is also a surprising amount of consistency. The method of documentation is fairly consistent among Utah, Idaho and Wyoming but quite different for Nevada because they use a Multiple Use Decision process after their Resource Management Plans are completed.

In nearly all cases, if reductions are to be made in both wild horses and livestock, the first reductions almost always come in the actual number of horses because the livestock reductions are first taken from the so-called "paper" AUMs. With some exceptions, livestock actual use has been reduced only after wild horse numbers have been reduced and monitoring has confirmed that the livestock numbers must also be reduced.

Over allocation of the forage resource appears to be a serious concern in some places because of past practices in conversion of sheep permits to cattle, inaccurate census of wild horse numbers, increasing numbers of elk and other factors.

However, the major conclusion of the team is that nearly every one is focusing on the process for making forage allocations rather than on the outcome. There seems to be a feeling both within BLM and among wild horse advocacy groups that if we only had the right formula or if we would only apply "good science" that the outcome would be more acceptable to everyone. Unfortunately, this does not appear to be a rational view of the real world.

The ultimate concern of the wild horse advocacy groups is with the collective results of the forage allocation process. That is, how many wild horses are going to be on the public ranges after this round of planning and how many can they reasonably be sure will be there in the future? While there may be some legitimate concerns with inconsistencies among various Bureau offices, the real concern is that, overall, wild horses are being threatened with a continued decline in their numbers.

The team concluded that "good science" can help define the extent of the forage resource as well as the possible options for utilizing the available resource and maintaining a "thriving natural ecological balance", but the ultimate decision on the balance between wild horses and livestock is a political one based on public perceptions of values. However, it is true that the appearance given by the common application of reductions to real horse numbers but, at least initially, paper livestock numbers is that the Bureau is favoring livestock at the expense of wild horses.

However, in many cases paper AUMs exist because livestock permittees have taken nonuse for many years, some for economic reasons within the industry, but some also because they recognize that the forage resource cannot sustain both their full preference numbers of livestock and the number of wild horses present on the range. To some extent then, livestock permittees have already taken reductions that have been financially impacting them for many years.

Unfortunately, it is also true that some paper AUMs exist because of questionable practices in past range adjudications or in conversions of sheep permits to cattle permits. In these cases, the Bureau will find it difficult to defend the fairness of a de facto policy of beginning livestock reductions from the full preference level rather than the actual use levels.

2. Recommendations:

The team recommends that forage allocations be directly tied to land use planning, either directly in Resource Management Plans or in subsequent Multiple Use Decisions that are tiered to specific objectives in the RMPs consistent with the regulations and the Supplemental Program Guidance for planning. In either case, Bureau policy should be to ensure full public involvement in the process and compliance with the National Environmental Policy Act. Regardless of the document used, each time there is a choice to be made among numbers of wild horses and cattle, there should be a full exploration of all of the reasonable alternatives.

Each alternative should have a discrete number (or specific range of numbers) for both wild horses and livestock and should fully disclose the differing effects on the resources as well as the social and economic impacts. Everyone must then recognize that the final decision on which alternative on forage allocation to select is not science or formula based, but is a social and political decision. "Good science" can then assure that the balance chosen will maintain sustainability and, if necessary, will lead to the improvement of the resource.

As decisions are made on livestock numbers, there should be a full disclosure of the historical basis for the present grazing preference and levels of active use by livestock. There should be a clear message from the Bureau leadership that a set formula, regardless of this history, is not an acceptable way of allocating forage among competing uses. Bureau policy should also emphasize the importance of allocating the forage resource among all competing uses, not just wild horses and livestock.

B. Appropriate Management Levels (AMLs).

1. Conclusions:

The way AMLs for wild horses are set and viewed varies considerably from District to District and, in some cases, even among Resource Areas in the same District. The most significant result of this is that there is no way to sum up the AML numbers to get a picture of the total target population of wild horses for a district, state or the Bureau as a whole. This leads to serious misunderstandings about the long-term outlook for wild horses on the public ranges. A single number is also very misleading since it will never match the actual population because of the continual changes in numbers from natural population increases which are periodically offset by gathers and removals.

There is considerable confusion and inconsistency in the way in which wild horses are counted and reported in relation to the AML, i.e., the age at which a wild horse should count toward the AML. This is important both for reporting purposes and for calculating the amount of forage that will be consumed by a given number of horses.

2. Recommendations:

The team recommends that the Bureau establish a policy which defines the AML as a range within which wild horse numbers will be allowed to fluctuate. The breadth of this range should consider the biological needs of the wild horses, the

economics of gathering and the number above which resource deterioration would be expected to begin. The Bureau's reports should then report wild horse numbers based on the sum of both the minimum numbers and the maximum numbers to establish the target range for the Bureau rather than an unrealistic and artificial single number.

The team recommends that a technical group be convened to develop specific recommendations on censusing and recording to establish a consistent policy of when to count a wild horse toward the AML.

C. Over Allocation Because of the Requirement to Base Livestock Reductions on Monitoring and to Phase In Reductions Over a Five Year Period.

1. **Conclusions:**

The team and many of the managers and resource specialists interviewed feel that the current regulatory requirement that decisions on livestock reductions be based on monitoring and that any subsequent reductions greater than 10% must be phased in over a five year period are significantly contributing to resource deterioration and decline in ecosystem health.

The common practice is to collect at least five years of monitoring data before initiating an intensive allotment evaluation which often takes another year to complete. This means it typically takes six years just to determine that there is a problem and to make the decisions on what to do about the problem. If the decision on the number of livestock is issued the same year as the allotment evaluation and the reduction is greater than 10% of actual use, it takes another five years to actually reduce the amount of livestock grazing to the established carrying capacity.

In the meantime, the decision on wild horses is often implemented the same or next year after the evaluation and decision. Wild horse advocacy groups complain that too often, by the third year of the scheduled livestock reduction, Bureau monitoring begins to detect an improvement in forage conditions because of fewer foraging animals and then we fail to follow through with the planned livestock reductions. They feel the result is horses have been reduced to the objective level, livestock get a reprieve from the planned reductions and long-term goals for resource improvement will not be met.

The above description assumes that a Resource Area has the funding and personnel to follow through with a good monitoring program. In the real world, we are doing less and less monitoring and, where we are doing monitoring, we are using

the methods that are least costly, not the best scientifically. Furthermore, the reliance on monitoring prior to implementing reductions means that the resource must deteriorate by a perceivable extent before the manager can decide that something needs to be done. This does not fit with the current rhetoric on good science and ecosystem management.

2. Recommendations:

The team was not able to document whether the concern about the failure to follow through on planned livestock reductions is real. However, the Bureau should follow up to assure that this scenario does not happen and, if it has happened, direct the appropriate managers to follow through with their commitments to reduce planned levels of livestock as well as wild horses.

The Bureau needs to take a new look at the practical effect of our reliance on monitoring.

D. Calculating AUMs of Forage for Wild Horses

1. Conclusions:

Most Districts are assuming that one AUM of forage for cows equals one AUM of forage for wild horses. One District, however, is using a conversion that provides for 1.25 AUMs for each wild horse.

There are also concerns among resource specialists that they do not have adequate information on things such as proper use factors for grazing by wild horses and that this may lead to inaccurate calculations on carrying capacities.

2. Recommendations:

The Bureau should convene a technical group to review the available literature and research on the amount of forage consumed by wild horses compared to cattle and to develop a Bureau policy. *Elk, mule deer*

This technical group should also discuss other related and appropriate issues such as the forage preferences for wild horses and the proper use factors to apply in calculating carrying capacities.

*ADULT/FOAZ RATIO
Fertility Rate*

*ONE WING/TROUSERS
3 gattuso
20 84 7000 lbs.*

FORAGE ALLOCATION STUDY PLAN

ISSUE: Several wild horse advocacy groups have questioned the way in which the Bureau allocates forage among competing livestock and wild horses.

BACKGROUND: Since the passage of the Wild Free-Roaming Horse and Burro Act of 1971, the Bureau has been charged with management of wild horses and burros on the public lands. At the time of the act there were serious resource conflicts associated with the number of livestock, wildlife, and wild horses and burros. This caused an early emphasis on removal of "excess" wild horses and burros with little definition of just how to determine how many were "excess".

The regulations at 43 CFR 4700.0-6 (a) state:

Wild horses and burros shall be managed in balance with other uses and the productive capability of their habitat.

Under the subheading "Land Use Planning", the regulations at 43 CFR 4710.1 state:

Management activities affecting wild horses and burros shall be in accordance with approved land use plans prepared pursuant to part 1600 of this title.

Under the subheading "Herd management areas", the regulations at 43 CFR 4710.3-1 state in part:

In delineating each herd management area, the authorized officer shall consider the appropriate management level for the herd.....

And, finally, under the subheading "Removal of excess animals from public lands", the regulations at 43 CFR 4720.1 state:

Upon examination of current information and a determination by the authorized that an excess of wild horses or burros exist, the authorized officer shall remove the excess animals immediately....

In the BLM Manual, Section 1622.4, the Supplemental Program Guidance for Wild Horse and Burro Management gives guidance on the types of decisions that are "required in every resource management plan" unless certain exceptions apply. Under "Management Objectives" the Manual at 1622.41A2 states:

Identify habitat related objectives for each herd management area. Where these areas also provide habitat and forage for

other large herbivores (wildlife or livestock), the objectives should address use of the forage by all species.

The Manual in Section 1622.41A3b under the heading "Adjustment Criteria" states:

Outline criteria for making adjustments, if necessary, in the initial herd size. These should include a statement of the critical resource use levels that will not be exceeded, as well as criteria that might guide necessary adjustments among consumptive uses.

The issue raised by the wild horse advocacy groups is that in making forage allocations and determining what animals are "excess", the result often is that wild horses end up being reduced in actual numbers while livestock reductions are often paper reductions.

OBJECTIVES OF THE STUDY: The Forage Allocation Study Team has been asked to document the various methods of arriving at the forage allocations among livestock and wild horses and the subsequent result in actual animal numbers, including the degree of consistency or inconsistency among the Districts and States.

STUDY METHODS: The Team will collect data through visits to a representative sample of the involved Districts. They will conduct interviews and review relevant documents. While we are most interested in the present situation and how we got there, it may also be useful to summarize the way in allocations have been made in the past. The major concern is for how allocations are made among livestock and wild horses, but it may be necessary to also include allocations to wildlife or other competing uses to get a complete picture.

STUDY REPORT: The Team in their final report will do at least the following:

1. Determine the basis being used for establishing the forage carrying capacity, i.e., the specific range survey, monitoring studies, etc.
2. Identify the methods and techniques for allocating forage among competing uses, i.e., historical use patterns, active versus non-use, public or other agency recommendations, etc.
3. Document the vehicles for actually putting those determinations into effect, i.e., land use plans and/or amendments, grazing decisions, allotment management plans,

herd management plans, multiple use decisions or some other documented process.

4. Document the practical effect of implementing the decisions in terms of the actual number of wild horses and/or livestock actually removed from wild horse herd management areas. To the extent that data are available, plot the historical trend of wild horse and livestock numbers for at least several representative herd management areas.

5. Summarize the degree of consistency or inconsistency among offices and states.

DEADLINES:

The final report of the team will be provided to the National Program Office and the appropriate staffs in the Washington Office no later than October 26, 1994.

REVIEW OF THE CEDAR CITY AND RICHFIELD DISTRICTS

1) Decision Process

Cedar City, Beaver River Resource Area...The initial basis for wild horse numbers was the 1971 census. The Land Use Plan (LUP), a 1983 MFP, utilized the 1982 census numbers and established that number as the Appropriate Management Level (AML). Two exceptions were made where Herd Management Area Plans (HMAPs), were completed and wild horse AML's were established by agreement. During the allotment analysis process, which was completed around 1982, the number of wild horses and wildlife which were present on a given grazing allotment were given a priority forage allocation adequate to provide for existing needs. Forage which remained after allocation to horses and wildlife was allocated to domestic livestock. The LUP dictated adjustments based on the SVIM data, however, adjustments were not entirely implemented to livestock because policy was modified to require monitoring data in combination with inventory data to make adjustments. These initial reductions were generally limited to 10 percent per year, though on occasion larger adjustments of primarily "paper AUM's" were agreed to. Reductions to livestock permits amounting to approximately 11,000 AUM's have occurred in the Pinyon planning unit from 1983 to the present. At present time wild horse numbers have remained static at LUP AMLs with all subsequent adjustments to the carrying capacity made to livestock. This process was implemented utilizing livestock agreements/decisions. * Notice should be taken that the Cedar City District is calculating AUMs at 1 AUM for livestock and 1.25 for wild horses.

Richfield, Warm Springs and House Range Resource Areas...The initial management of wild horses was by agreement with the Counties in 1968. A West Desert Wild Horse Capture plan was written in 1977 that recommended and implemented wild horse gathers in 1978 to reduce their numbers to the 1971 census level. In part, the capture plan was based on 1976 studies, both vegetative and herbivore. Between 1978 and 1987 when the LUP's were developed, addendums to the original capture plans were developed that recognized existing increasing numbers as appropriate with the carrying capacity based on the 1976 studies. In 1987, Resource Management Plans (RMP's) for both resource areas were developed that recognized those AML's established through the addendums. Wild horses and wildlife were given priority allocation of forage (IN BLOOD). One RMP established current use for wild horses and wildlife as opposed to the other which established wild horses at current populations while wildlife were established at an increased objective. Livestock remained at existing levels to be adjusted through the use of monitoring data. At the present time wild horses have been maintained at the established AML's with a few exceptions based on evaluations of monitoring and census data.

* Within both Districts the allotment analysis utilized monitoring data and was documented through the allotment evaluation process.

2) Appropriate Management Levels (AMLs)

With few exceptions based on HMAPs, both the Cedar City and Richfield Districts established AML's in their LUPs based on existing population numbers. Since that time with little exception, capture plans have been initiated to reduce wild horses to those LUP numbers.

Both Districts indicated that in their interpretation the AMLs are written IN BLOOD!

One District manages for an established set AML while the other District manages for the established AML with a minimum and maximum range.

3) Wildlife

Wildlife were given priority in the forage allocation process during the establishment of the LUPs. In two of the Resource Areas wildlife numbers were established at current population numbers while in the third area interviewed, objective numbers established in the LUP were greater than the current use.

Wildlife forage allocation appeared not to be a major issue since livestock monitoring adjustments are designed to compensate for wildlife objectives.

4) Trend*

Wild Horses:

In the '70s the trend was to maintain the wild horse levels at the 1971 census. As the populations increased Cedar City took little or no action to adjust the numbers since the population levels were fairly low and not a resource issue.

In the late '70s the Richfield District gathered the West Desert HMAs to maintain 1971 levels. After this point the herds were allowed to increase to the LUP established levels and have been maintained at that level to present.

Livestock:

In Cedar City, active preference has been status quo since the LUPs while actual use has slightly increased within HMAs.

In Richfield, livestock use remained fairly constant until completion of the LUPs when subsequent evaluations and livestock

agreements reduced active preference. These were primarily "paper AUMs".

*Trend information cannot be compiled at this time; the database is not available within the time constraints provided.

REVIEW OF THE ELKO AND ELY DISTRICTS

WELLS RA - BILL BAKER, Area Manager

Draft RMP Alternatives:

- NO ACTION:
- RESOURCE PRODUCTION:
- MIDRANGE
- RESOURCE PROTECTION:
- PREFERRED:

Objective: To continue management of the six existing wild horse herds(See Map 3-4) consistent with other resource uses.

Short and Long-Term Management Actions:

1. Continue to monitor wild horse populations and habitat conditions.
2. Conduct wild horse gatherings as necessary and allow wild horse populations to increase so as to maintain populations within a range from 557 to 692 animals. The Toano herd would be maintained at 20 animals.
3. Construct.....
4. Remove WH&Bs from private lands if required.

Proposed RMP:

Objective: To continue management of the six existing wild horse herds(See Map 3-4) consistent with other resource uses.

Short and Long-Term Management Actions:

1. Continue to monitor wild horse populations and habitat conditions.
2. Conduct wild horse gatherings as necessary and allow wild horse populations to increase so as to maintain populations within a range from 550 to 700 animals.
3. Construct.....
4. Remove WH&Bs from private lands if required.

Approved RMP/Record of Decision:

1. Monitor wild horse populations and habitat conditions; Maintain populations within a range of 550 to 700 animals.
2. Construct six water development projects.
3. Remove WH&Bs from private lands if required.

WH&B DRMPA:

- NO ACTION:
- PREFERRED:

This alternative combines the management of the six existing herd areas in the Wells RA into four herd management areas. All areas of checkerboard land ownership, including all of the Toano Herd Area and portions of the Goshute and Spruce-Pequop Herd Areas, will be managed as horse-free areas. The management of wild horses begins at initial herd size and will be maintained in designated HMAs. Adjustments will be based on monitoring and grazing allotment evaluations. Wild horse numbers in excess of the initial herd size would be removed within statewide priorities.

Objectives:

1. To manage wild horses only on areas where requests for removal of animals will not hinder management.
2. To manage wild horses within HMAs and maintain a thriving natural ecological balance consistent with other resource needs.
3. To combine portions of the wild horse herd areas where horses intermix between herd areas.

Management Determinations: 1. Delineate four HMAs...

ELKO RA-TERRY DAILEY, Area Manager

ELKO DRMP-1985

ALTERNATIVE A: 1. Continue management of current population levels on four existing wild horse herd areas with an existing population of 330 horses.

2. Conduct wild horse gatherings as needed to maintain current numbers.

ALTERNATIVE B: 1. Manage the four wild horse herd areas, with a target population of 220 horses.

2. Conduct wild horse gatherings as needed to maintain current numbers.

ALTERNATIVE C:

Short-Term Management Actions:

1. Evaluate wild horse habitat to reduce or eliminate conditions that would prevent population numbers from increasing.

2. Construct three water development projects (catchment type) each with a storage tank and trough (table 2-2)

Long-Term Management Actions:

1. Manage the four wild horse herd areas with a target population of 660 horses.

2. Conduct wild horse gatherings as needed to maintain numbers.

ALTERNATIVE D (PREFERRED ALTERNATIVE):

1. Manage the four wild horse herd areas, with a target population of 330 horses.
2. Monitor wild horse populations and habitat conditions.
3. Construct two water development projects (catchment type) each with a storage tank and trough (table 2-2)
4. Conduct wild horse gatherings as needed to maintain numbers.

ALTERNATIVE E:

Short-Term Management Actions:

1. Monitor wild horse populations and habitat to reduce or eliminate conditions that would prevent population numbers from increasing.
2. Construct three water development projects (catchment type) each with a storage tank and trough (table 2-2)

Long-Term Management Actions:

1. Manage the four wild horse herd areas, with a target population of 660 horses.
2. Conduct wild horse gatherings as needed to maintain numbers.

ELKO PRMP-1986:

1. Manage the four wild horse herd areas, with a target population of 330 horses.
2. Monitor wild horse populations and habitat conditions.
3. Construct two water development projects (catchment type) each with a storage tank and trough (table 2-2)
4. Conduct wild horse gatherings as needed to maintain numbers.

ELKO ARMP/ROD-1987

1. Manage the four wild horse herd areas, with a target population of 330 horses (Map 11) as follows:

<u>HMA</u>	<u>AML</u>	<u>ALLOTMENT</u>
Owyhee	58	Owyhee
Little Humbolt	107	Little Humbolt
Rock Creek	119	Rock Creek
Diamond Hills	46	Red Rock, Brown

2. Monitor wild horse populations and habitat conditions.
3. Construct two water development projects (catchment type) each with a storage tank and trough (table 2-2)
4. Conduct wild horse gatherings as needed to maintain numbers.

No gathers made since LUPs, no WH&B amendments, no grazing decisions involving WH&B areas.

1. ALLOCATION DECISION PROCESS

ELKO DISTRICT

WELLS RA: Completed a RA-wide RMP Amendment which refined HMAs and established AMLs. Alternative levels were analyzed in an apparently legitimate multiple use context to arrive at final levels. Nevada's MUD process used to arrive at both livestock and wild horse allocations, all legitimately tiered to the RMP and RMP Amendment for wild horses. This is the cleanest documentation of the decision process of the four RAs reviewed.

ELKO RA: The same process as Wells has been forecast but nothing significant has occurred as yet. First allotment evaluation will be this year.

ELY DISTRICT

SCHELL RA: Used the MUD process exclusively, no amendment to the MFP was done.

EGAN RA: Using the MUD process exclusively and independent of the RMP.

All RAs expressed some of the same problems, e.g., no valid allocation among vegetation users, previous conversions from sheep operations to cattle operations have resulted in significant levels of "paper" AUMs, have not been successful in a full multiple-use approach to monitoring, no one available at the interview time could certify a known tie between an identified vegetative carrying capacity and the allocations resulting from a number of independent actions (i.e., land use planning, wild horse management pushes, livestock use monitoring). All RAs have relied on analysis of monitoring data to arrive at "carrying capacity".

2. APPROPRIATE MANAGEMENT LEVELS FOR WILD HORSES

ELKO DISTRICT

WELLS RA: Used HMAs and numbers determined administratively between 1972 and 1982 through census methods. Final HMAs (checker-board ownerships were dropped) were established formally through an amendment to the Wells RMP. In this same action, AMLs were established in the form of a range of numbers for each HMA. Interviews indicate they regard the

range as the AML, not as min/max. Strong correlation between numbers in the RMPA and MUD decisions now in place. Seems to be a concerted effort to maintain numbers within the range of the AMLs.

ELKO RA: AMLs considered to be the historic levels (71-?). There have been no gathers in recent history and no grazing decisions issued after monitoring, so the acceptability of these AML numbers has not yet been a serious question. Elko RMP established "target" AML numbers, but does not define that in relation to maximum, minimum or average. In addition, the RMP decisions reflect total RA (four HMAs) numbers rather than for the individual HMAs (unless that's buried in a table that the reviewer missed). Elko RMP did not accomplish specific allocation of forage among the many competing uses.

ELY DISTRICT

SCHELL RA: AMLs used census ('72+) figures as a starting base for monitoring. AMLs were solidified in the MFP ('83) as a result of a comprehensive census of that year. All "I" category allotments have been completed (MUD) and decisioned with none going to court. Current numbers are at or near the AMLs identified in the MFP.

EGAN RA: Same general scheme as Schell RA, through the completion of the Egan RMP. Grazing decisions are now in progress. AMLs are established by allotment, aggregating upwards to the HMA. Cumulative decisions have little to do with AMLs established in the RMP. "AMLs in the RMP have kept RMP AML numbers updated". (Reviewers Note: Plan Maintenance **can not** result in changing the RMP Decision (i.e., **numbers**)!

3. WILDLIFE ISSUES

All RAs visited expressed the same problems though of varying degrees of severity. No target management numbers established for wildlife and, therefore, no known and documented balancing of the various competing uses of vegetation; elk numbers in particular have risen far above historic levels (Wells RA has issued a Draft RMP Amendment addressing this issue, but has yet to reach resolution with State).

4. TRENDS

All RAs indicated same general trends though documentation was not immediately available: wild horse populations "exploded" during the gathering moratoriums of the 70s and 80s, only "priority areas" in the state have been able to bring them down to a manageable range, grazing/wild horse decisions have generally reduced only wild horses because of extensive voluntary non-use by livestock operators, the major problem

being previous conversions of sheep to cattle operations without regard to the differing forage demands/vegetative availability of/for the two kinds of livestock.

REVIEW OF THE WINNEMUCCA AND BOISE DISTRICTS

I. INTRODUCTION

- A. Purpose of review- To find out how forage is being allocated.
- B. Format of report - Six major topics were identified by the team. These topics are discussed specifically by State in a general fashion. If there were special circumstances or items in need of further explanation, more detailed analysis is provided.

II. ALLOCATION/DECISION PROCESS

A. Basis:

1. Nevada:

Winnemucca District. The census following the WFRHBA was used as the basis for AMLs for all Herd Management Areas. Census, completed in 1982, was the basis for development of the MFP planning documents during the mid 1980's. MFPs set goals and objectives for management of livestock, wildlife, and wild horses. Generally speaking, the use levels occurring in 1982 established ratios of livestock to cattle which are still in use today.

During the mid to late 1980's the CRMP process was used to establish use levels on some allotments and HMAs. Livestock numbers were generally aligned along long-term actual/licensed use whereas horse numbers were determined to be maximum numbers.

The early 1990s have seen a shift to interdisciplinary and more interest group involvement. An intensive analysis and evaluation of data is used to determine use levels appropriate to the natural resources involved.

2. Idaho

Boise District. The census following the WFRHBA was used as the basis for AMLs for all Herd Management Areas. MFPs set goals and objectives for management of livestock, wildlife, and wild horses.

The early 1990s have seen a shift to interdisciplinary and more interest group involvement. An intensive

analysis and evaluation of data is used to determine use levels appropriate to the natural resources involved.

B. Method of Implementation.

1. Nevada used the MFP to implement all WHB, wildlife, and livestock followed by the RMP process in the 1990's. Multiple use decisions are used to implement management decisions (see the paper on the MUD process).

2. Idaho also used the MFP/RMP process to implement planning decisions. Grazing decisions and gather plans were the means to complete administrative procedures.

C. Approach.

1. Nevada. 1971 census figures were used as the basis for management up until 1982, then proportions were based on politics/socio-economics of the affected area which greatly influenced the numbers set in the new RMPs. This was done through negotiations, agreements, or the CRMP process.

2. Idaho. 1971 census figures were used as the basis for management through the 1990's RMP.

III. APPROPRIATE MANAGEMENT LEVEL (AML)

A. Nevada: AMLs are considered to be maximum numbers. Originally set in 1971 with census as required by Law. Based on existing numbers at that point in time. Not based on resource conditions. HMA's boundary determined at same time.

AML's set may not be equitable with resource capability (i.e., at time of initial census, WH&B's were seasonally displaced and not counted, or possibly double counted, or out of area). This same situation occurred in the '80s when census was taken for RMP development.

CRMP's, MOU's, Political agreements either aided in setting or modifying the RMP levels set for WH&B's.

B. IDAHO: AMLs are considered to be maximum numbers. Staff specialists, however, mentioned that they would prefer using a range of numbers (Minimum/Maximum). Originally set in 1971 by census as required by Law. Has remained the same since.

Some HMA's have had AML set based on available water. Currently in process of draft RMP's, however, original 1971 census numbers and established AML's still used.

IV. WILDLIFE

A. NEVADA: Nevada division of Wildlife (NDOW) does not set population(s) numbers based on identified carrying capacity. They use "reasonable numbers" they obtain from wildlife counts and professional estimates. Therefore, wildlife numbers given to BLM for RMP's, and other decision type documents are "reasonable numbers". There are only a very few areas where the State (NDOW) can provide actual population numbers tied to an area's capacity.

B. IDAHO: Idaho State Game and Fish has population goals and objectives, however, they are not tied to a land base's actual capabilities/carrying capacity. The majority of Idaho's objectives are to maintain or increase what they currently have. Actual population numbers are difficult to obtain from the State. Therefore wildlife allocations in RMP's and decisions involving WH&B's may not be equatable with other resource allocations considering livestock and WH&B's.

V. TRENDS

A. NEVADA:

1. HORSES - Horse numbers from 1971 census and AML establishment (initial) have increased. WH&B numbers as set in the 80's through the RMP development, CRMP and other social/political negotiations process were increased from original census/AML set. This was due to higher horse/burro numbers existing at that time.

Multiple Use decision process (MUD's) have been utilized to reach a more equitable Thriving Natural Ecological Balance (TNEB) which has resulted in gathers to reduce WH&B's to the AML's set in the 1980's through the RMP's.

2. LIVESTOCK - Livestock licensed numbers have essentially remained same over time. Operators have taken non-use from preference due to economics and drought situations long lasting since 1980's. MUD process has attempted to reduce authorized numbers and done so in places. Regulations require five (5) year phased-in livestock reductions.

3. WILDLIFE - Population goals/objectives remained same/constant. Populations have fluctuated due to natural dynamics, however, have remained static.

B. IDAHO:

1. HORSES - Original AML set in 1971 based on census. Gathers have maintained overall herd numbers at original AML's. RMP's developing in 90's are utilizing initial numbers for

horses/burros as set in 1971. Recent appeal has allowed one herd to grow until data indicates deterioration of the resource.

2. LIVESTOCK - Grazing EIS's are evaluating numbers. Authorized numbers are less than preference.

3. WILDLIFE - Population numbers have remained status quo with natural population dynamics. Elk have generally increased causing overlap and conflict with livestock and horses in some areas.

VI. CONSTRAINTS

A. NEVADA:

1. Original 1971 census based on number of WH&B's there at the time and not necessarily correct based on actual caring capacity of the area.

2. MFPS in '80s based on new census information and generally increased the WH&B numbers over the original 1971 levels. These numbers were used to set proportions in MFPS between livestock (existing preference) and number of WH&B's. The number of WH&B's censused may not be correct in some HMA's due to seasonal movements, locations, etc. So proportions in some HMA's may not be correct, which may result in poor percentage reductions coming out of MUD's.

3. Politics/social economics - The negotiation process from and through agreement, CRMP's, MOU's etc. - lead to allocation of uses rather than allocations based on true capacity of available resources. Even though this is a reality, this caused over allocations which is in conflict with regulations, policy and proper resource management (when considering principles of ecosystem management).

4. Review process through various levels of organization adds time. This affects timely decisions which in turn delays resource improvement.

5. AML's set in RMP's not necessarily meeting need of the resources on the ground.

6. Policy of reducing livestock numbers based on decision usually takes five (5) plus years which constrains and retards timely resource improvement/advancement.

B. IDAHO:

1. Other resource programs committed/allocated resource (i.e.- livestock, recreation) spatially and temporally (i.e.- spring recreational use). Direct conflict with foaling areas and competing uses which in effect over allocated available resources.

2. Resource availability may be a constraint for example, water may be controlled by permittee and not the U.S. Government. Or, when areas are unserviceable (poor or non-functional range improvements like water) allocations may have been made anyway, thus over allocating the resource.

3. One HMA had a very small herd size far below the 50 recommended by some geneticists.

REVIEW OF THE ROCK SPRINGS AND RAWLINS DISTRICTS

I. BACKGROUND

Rock Springs District:

There are three primary wild horse herd management areas in the Rock Springs District. All are within the Green River Resource Area:

White Mountain	392,600 acres
Great Divide Basin	778,900 acres
Salt Wells Creek	1,193,300 acres

A portion of a fourth herd management area, the Adobe Town WHHMA is partially in the Green River Resource Area, with the rest of the HMA in the Great Divide Resource Area of the Rawlins District to the east. This HMA, by agreement, is administered by the Rawlins District.

The Green River Resource Area contains a substantial amount of "checkerboard" lands, both north and south of Interstate 80, which are included in all four of the herd management areas. These lands create a substantial management problem under the Wild Horse and Burro Protection Act because the alternating sections of public and private land result in wild horses moving freely between public and private lands. The Rock Springs Grazing Association (RSGA) controls administration of the bulk of the private lands within the checkerboard area.

Rawlins District:

The Rawlins District has four wild horse HMAs. None are in the checkerboard area, so the issues are quite different than those in the Rock Springs District. Of the four HMAs, one is in the Lander Resource Area (encompassing 6 herd areas) and three are in the Great Divide Resource Area, including the Adobe Town HMA shared with the Rock Springs District.

II. FORAGE ALLOCATION DECISION PROCESS

Rock Springs District:

The objectives for the number of wild horses to be maintained were set by agreement. In 1979, representatives of the Rock Springs Grazing Association (RSGA) met with a local wild horse interest group, Wild Horse Yes, and the International Society for the Protection of Mustangs and Burros to establish mutually agreeable numbers for wild horses. They agreed to numbers both north and south of Interstate 80 and then presented their numbers to the BLM. Generally, the agreed

upon numbers called for 1,000 wild horses north of I-80 and 600 wild horses south of I-80.

In March 1981, in response to litigation brought by Mountain States Legal Foundation on behalf of the RSGA, the Federal District Court ordered BLM to "remove all wild horses from the checkerboard grazing lands in the Rock Springs District except that number which the Rock Springs Grazing Association voluntarily agrees to leave in said area." This litigation was precipitated by the inability of the Bureau to control wild horse populations to the previously agreed upon levels.

The Court Order further required that:

...the Rock Springs District...shall within two years...remove all excess horses from within the Rock Springs District.

...excess as defined in this Order and the Act means that the wild horse population exceeds the number deemed appropriate by a final environmental statement. In the absence of such a statement excess means that the number of horses exceeds the number present in the same area at the time the Act was passed....

The original court order was amended in February of 1982 to include the following:

...the Bureau of Land Management has determined that the appropriate management level for the horse herds on the Salt Wells/Pilot Butte checkerboard lands is that level agreed to by the landowners in that area. All horses on the checkerboard above such levels are "excess" within the meaning of 16 U.S.C. 1332(f)....

...in the Final Environmental Impact Statement for the Sandy Area, the Bureau of Land Management's proposed action was for an average herd management level in that area of 825 horses. All horses in the Sandy Resource Area above that level are "excess"...

..."excess," as used in this Order, means those wild horses above the population level that the Bureau of Land Management has determined to be appropriate, in accordance with its multiple-use management responsibilities under 16 U.S.C. 1332(f) and 1333; or, in the absence of such a determination, the number of horses above the number present at the time the Act was passed.

Planning decisions concerning wild horses are documented in the Big Sandy and Salt Wells Management Framework Plans. The AML for wild horses was not changed from the original numbers agreed to by the RSGA because any additional numbers allowed on public land could, at some point, be found on private checkerboard lands covered by the District Court Order. Horse numbers are also mentioned in the Sandy Grazing

EIS and the Salt Wells/Pilot Butte Grazing EIS. Herd Management Plans were completed for the Divide Basin HMA in 1981 and the Salt Well Creek HMA and White Mountain HMA in 1982. Each of these plans and EISs accepts as the decision the original agreed upon number of 1600 wild horses.

Gathering EAs and decisions were appealed by wild horse interest groups in 1990. On February 22, 1991, the IBLA affirmed BLM decisions to gather wild horses according to the 1990 gathering EA and recognized the district's approach to using AMLs from the Court Order to establish AMLs for wild horse management areas that include checkerboard lands. They stated that "(t)he issue of AMLs of wild horses and what constitutes 'excess,' has been determined with finality by the District Court Orders."

The Green River Resource Area is in the process of completing a Resource Management Plan to replace the two MFPs. The Draft Green River Resource Area RMP/EIS on page 16 states:

The Green River RMP EIS will consider appropriate management levels for horses in accordance with an existing court order and related agreements.

The currently used appropriate management levels (AML) for wild horses were based on the numbers agreed to and on existing land use plans. The AML for wild horses in the solid block public land areas was not changed from the numbers agreed to by the Rock Springs Grazing Association, because any additional numbers allowed on solid block public land would, at some point, be found on checkerboard lands covered by the District Court Order.

The management of wild horse populations must be in compliance with the District Court Order. Therefore, it is assumed that wild horse numbers in compliance with the District Court Order are those numbers agreed to by the Rock Springs Grazing Association, and that any wild horses above that number are "excess", in the meaning of the Act, and are subject to gathering.

On page 142 the preferred alternative in the draft RMP says:

Permitting for livestock grazing would continue until monitoring, negotiation, or a change in resource conditions indicate that a modification is needed.

On page 143 the draft RMP says:

Authorized grazing preference may be reduced in areas with excessive soil erosion and poor range condition, if allotment evaluation warrant such a change or if necessary to provide forage for wildlife, wild horse, and recreational use.

The current authorized active livestock use and existing forage reservations for wildlife and wild horses would be maintained. Existing rangeland monitoring would continue and additional rangeland monitoring would be initiated to determine the need for forage allocation adjustment.

Rawlins District:

The district used public input through its MFP process to set the original AMLs. Interested and affected groups were asked to comment on the AMLs and at that time everyone was, of course, very aware of the law suite ongoing in the adjoining Rock Springs District. RMPs have now been completed for both Resource Areas and Herd Management Area Plans have been completed for each of the four herd management areas. These plans set the AMLs for each of the HMAs. These AMLs were reassessed in wild horse evaluations completed for each of the two Resource Areas, 1992 for the Lander RA and 1994 for the Great Divide RA.

The 1988 Medicine Bow-Divide (Great Divide Resource Area) RMP set a total AML for the Great Divide RA described as a range of 406 - 735 animals for the three HMAs in the Resource Area, the same as provided for in the earlier MFP. An evaluation of the HMAs in the Great Divide Resource Area completed in 1993 resulted in a new decision to maintain the AML for the Resource Area at a median of 995 animals.

The decision on the number of wild horses in the 1987 Lander RMP was to continue the 1983 interim wild horse herd management levels established in the Green Mountain Management Framework Plan. This provided for a median population of 580 animals with a minimum number of 420 animals and a maximum number of 815. The RMP on page 80 states "this initial or interim population level will be monitored, along with the habitat, to allow further adjustments as necessary to maintain viable herds and satisfactory range condition".

The 1992 evaluation of the Lander HMA slightly increased the forage allocation for wild horses to provide for a new total of 490 to 836 adult animals. The evaluation document also states that monitoring studies in grazing allotments within the herd areas will continue to be used to determine if adjustments in active grazing preference and changes in livestock/range management are needed.

The 1993 decision to gather horses in the Lander HMA resulting from the decisions in the 1992 evaluation of the HMA was appealed to the IBLA by the Animal Protection Institutes of America. The IBLA decision on the appeal is still pending. Two of the four issues on appeal include the accusation that the BLM decision on removal is not based on monitoring and that BLM has not determined how many wild horses must be removed to restore the thriving ecological balance.

III. APPROPRIATE MANAGEMENT LEVELS

Rock Springs District:

The original agreement on a total of 1600 head of wild horse in the district viewed these numbers to be the maximum number of horses for the district. Beyond that number, wild horses are considered to be "excess" as defined in the Court Order. However, for management purposes, the AMLs for wild horses in the Rock Springs District are managed to maintain numbers within a certain range. It was assumed that excess wild horses in a herd management area would be gathered at least every two years and that there would be a 20 percent annual increase in population.

North of I-80 the AMLs fall about the middle of the identified range, with 1000 head being the maximum in accordance with the agreement. South of I-80, the AML is defined as the top of the range rather than the middle. The maximum number allowed is the 600 head in conformance with the District Court Order. The areas north and south of I-80 were in two different Resource Areas that have subsequently been combined into the present Green River Resource Area.

Rawlins District:

AMLs were set considering the amount of nonuse historically being taken, the heavy utilization of some riparian areas, the horses' social behavior and space requirements which at some level of numbers cause the horses to begin to move outside of designated herd areas and the availability of water.

On page 3 of the 1993 evaluation of the Great Divide HMAs, it states: "The AML becomes the median of the range..." In calculating the upper and lower limits, it was assumed that excess horses would be rounded up every three years and that the rate of population increase was 20% per year.

IV. WILDLIFE ISSUES

In neither the Rock Springs nor the Rawlins district was wildlife viewed as a significant factor in allocating forage to wild horses. The degree of dietary overlap for antelope and mule deer was slight and, when combined with the seasonal timing of their use compared with that of the wild horses, led to a general conclusion that there was little direct conflict among most wildlife and wild horses. There were, however, a few site-specific areas where use by elk was considered a competitive use and this was considered when evaluating causes for decline in some riparian areas and the decisions on the numbers of horses in some of the Rawlins herds.

IV. RESULTS AND TRENDS

Rock Springs District:

The numbers of wild horses within the Rock Springs District has fluctuated because of budgetary constraints on roundups and appeals, but the target number of horses or AML has remained the same since 1982.

The staff of the Green River RA said that they feel there is little direct competition among wild horses and livestock at the present time. Livestock use within the HMAs is primarily winter sheep grazing and a substantial amount of nonuse has been occurring for a number of years. Some of this nonuse has been because of the presence of the wild horses, but most has more to do with the problems within the sheep industry. The amount of nonuse was not further documented because the present allocation of forage to wild horses was established independent of the forage allocation issue and because monitoring indicates there is sufficient forage for both the agreed upon numbers of wild horses and the historic level of use by livestock. However, the RMP currently being prepared recognizes that at some time in the future an allocation may need to be made and establishes a basis for considering reductions in livestock numbers if needed.

Rawlins District:

The decision made in the 1993 evaluation report for the Great Divide RA increased the AML from a range of 406-735 wild horses set in the 1988 RMP to a new AML of 995, which is to be the median of the range in the number of horses. There was no adjustment in the number of livestock.

For the 10 years preceding the 1993 evaluation livestock use in the allotments in the Great Divide RA that are within the HMAs has been considerably below the preference. Averages for percent of active preference actually used ranged from about 17 percent to 73 percent with the average for the 19 allotments being about 47 percent. Nonuse has been partially the result of voluntary adjustments because of the presence of the wild horses, but the primary reason for nonuse has been labor and other economic problems within the livestock industry, especially within the sheep industry.

In general, monitoring has shown that within the HMAs in the Great Divide RA that utilization, condition and trend on most upland areas does not present a problem. However, riparian areas are consistently overgrazed for too long a time, are in less than desirable condition and are not improving.

The 1986 RMP for the Lander RMP set the number of wild horses at a median population of 580 animals with a minimum number of 420 and a maximum number of 815. The 1992 evaluation of the Lander HMA resulted in a slight increase in the forage allocation for wild horses to

provide for a total of 490 to 836 adult animals. The evaluation document also states that monitoring studies in grazing allotments within the herd areas will continue to be used to determine if adjustments in active grazing preference and changes in livestock/range management are needed.

The actual livestock use for the Lander HMA for the years 1982 to 1991 for the allotments that are located within the herd areas ranges from a low of 45 percent of preference to a high of 88 percent of preference with an average of about 68 percent. During the same period of time, the actual numbers of wild horses was considerably above the AMLs. For example, in February of 1992 as the evaluation was being prepared, about 1100 adult horses were counted, compared to the AML at that time which set the upper limit at 815 and a median of 500.

The Lander HMA evaluation found that the range trend in general is static to slightly up. However, utilization is high on all riparian areas within all of the allotments inside the HMA (upwards of 80%) and riparian conditions are only fair to good. Some riparian sites are still in less than desirable condition (mid to low fair) and the evaluation concluded that in some areas continued implementation of a combination of management actions is still needed. Livestock management actions taken to date to help alleviate the pressure on the resource include fencing, herding and changes in livestock turnout dates.

V. CONSTRAINTS

The primary constraints for establishing the allocation for wild horses in the Rock Springs District has been the acceptance of a reasonable number of horses on the private lands within the checkerboard area by the Rock Springs Grazing Association.

The primary constraints for the Rawlins District appeared to be that number of wild horses above which the horses begin to move onto checkerboard lands and other lands outside established HMAs and the site-specific condition of some riparian areas.

EXCERPTS FROM REGULATIONS AND BLM MANUAL

The regulations governing both administration of livestock grazing (subpart 4100) and management of wild horses (subpart 4700) tie decisions in these programs to the Bureau's land use planning requirements (part 1600). Quotations from the portions of the regulations (43 CFR ____) and BLM Manual on planning relevant in some way to the allocation issue are included below:

4100.0-5 Definitions.

Livestock carrying capacity means the maximum stocking rate possible without inducing damage to vegetation or related resources. It may vary from year to year on the same area due to fluctuating forage production.

4100.0-8 Land Use Plans.

The authorized officer shall manage livestock grazing on public lands under the principle of multiple use and sustained yield, and in accordance with applicable land use plans. Land use plans shall establish allowable resource uses (either singly or in combination), related levels of production or use to be maintained, areas of use, and resource condition goals and objectives to be obtained. The plans also set forth program constraints and general management practices needed to achieve management objectives. Livestock activities and management actions approved by the authorized officer shall be in conformance with the land use plan as defined at 43 CFR 1601.0-5(b).

4110.2-2 Specifying grazing preference.

(a) Grazing preference shall be specified in all grazing permits or grazing leases. It shall include both active use and suspended use. Active use shall be based upon the amount of forage available for livestock grazing established in the land use plan as defined in 43 CFR 1601.0-5(k).

4110.3 Changes in grazing preference status.

The authorized officer shall periodically review the grazing preference specified in a grazing permit or grazing lease and may make changes in grazing preference status. These changes shall be supported by monitoring, as evidenced by rangeland studies conducted over time, unless the change is either specified in an applicable land use plan or necessary to manage, maintain or improve rangeland productivity.

4110.3-2 Decreasing active use.

(b) When monitoring shows active use is causing an unacceptable level or pattern of utilization or exceeds the livestock carrying capacity as determined through monitoring, the authorized officer shall reduce active use if necessary to maintain or improve rangeland productivity, unless the authorized officer determines a change in management practices would achieve the management objectives.

4130-6-1 Mandatory terms and conditions (in part).

(a)...The authorized livestock grazing use shall not exceed the livestock carrying capacity as determined through monitoring and adjusted as necessary....

4700.0-2 Objectives.

The objectives of these regulations are management of wild horses and burros as an integral part of the natural system of the public lands under the principle of multiple use....

4700.0-6 Policy.

(a) Wild horses and burros shall be managed as self-sustaining populations of healthy animals in balance with other uses and the productive capacity of their habitat.

(b) Wild horses and burros shall be considered comparably with other resource values in the formulation of land use plans.

(d) In administering these regulations, the authorized officer shall consult with Federal and State wildlife agencies and all other affected interests, to involve them in planning for and management of wild horses and burros on the public lands.

4710.1 Land use planning.

Management activities affecting wild horses and burros, including the establishment of herd management areas, shall be in accordance with approved land use plans prepared pursuant to part 1600 of this title.

4710.3-1 Herd management areas (in part).

In delineating each herd management area, the authorized officer shall consider the appropriate management level for the herd, the habitat requirements of the animals, the relationships with other uses of the public and adjacent private lands, and the constraints in 4710.4.

The BLM Supplemental Program Guidance which directs how land use plans are prepared appears in the BLM Manual in section 1620. The policy section states that the resource management planning determinations set forth in this series of the Manual are required in every RMP unless one of four specific exceptions apply. One of these exceptions provide that:

D. A "determination is not required if management has decided that it would be premature to make the determination in question and that it should be handled through a subsequent plan amendment when and if the need arises. (Such deferrals are normally identified during preplanning.)

The determinations required for wild horse and burro management are listed in the Manual at 1622.41 and include the following:

A. Resource Management Planning. The following wild horse and burro related determinations are required in every resource management plan unless one of the exceptions discussed in BLM Manual 1620.06 applies.

1. Management Areas. Delineate public land areas where herds of wild horses or burros will be maintained and managed in the long term (herd management areas).

2. Management Objectives. Identify habitat related objectives for each herd management area. Where these areas also provide habitat and forage for other large herbivores (wildlife or livestock), **the objectives should address use of the forage by all species.** (emphasis added)

3. Management Direction.

a. Herd Size. Identify the **initial herd size** for each herd management area. **Long term herd size and forage requirements** must be estimated. (emphasis added)

b. Adjustment Criteria. **Outline criteria for making adjustments, if necessary, in the initial herd size.** These should include a statement of the critical resource use levels that will not be exceeded, as well as criteria that might guide necessary adjustments among consumptive uses. (emphasis added)

c. Resource Constraints. List by herd management area constraints that will be required on other resource uses, both consumptive and nonconsumptive, to allow for herd management at the appropriate intensity.

d. Wild Horse and Burro Ranges. Recommend for approval by the Director herd management areas proposed for designation as ranges.

B. Activity Planning. The following wild horse and burro related determinations are usually deferred to activity planning: objectives relating to herd composition or animal characteristics; monitoring methods and schedules; range improvement needs; schedules for management actions; **upper and lower limits on herd size, within which the population will be allowed to fluctuate**; and criteria for selective removal of animals, if any. (emphasis added)

ALLOTMENT EVALUATIONS TO MULTIPLE USE DECISIONS

Presented to the "NATIONAL WILD HORSE AND BURRO FORUM" May 8, 1991
by Brad Hines

HISTORICAL BACKGROUND

The Bureau of Land Management (BLM) in Nevada is implementing multiple use management on nearly 48,000,000 acres of public land under the direction of fourteen existing Land Use Plans (LUPs) that have been prepared throughout the State. Generally these LUP's correspond to the twelve Resource Area boundaries that occur within the six district offices.

Beginning in the late 1970s and continuing in the late 1980s the BLM in Nevada was in an intensive land use planning phase. The emphasis which began this effort was the court settlement (NRDC v. Morton), agreed to between the National Resource Defense Council, the BLM and Federal Court wherein, the BLM was to prepare 212 Environmental Impact Statements (EISs) to analyze the impacts of grazing domestic livestock on public lands.

The proposed action in the early planning efforts which were analyzed in the EIS's contained, in part, a forage allocation to livestock, wild horses and burros, and wildlife. These proposed actions used "one point in time range land inventories" as a data base to determine the overall carrying capacity of the range and proposed various allocations of the capacity between varying uses. This policy became controversial and centered around the validity of using "one point in time inventories" as the main criteria for allocations. As a result of this controversy in 1982 the BLM Director issued a new policy that required adequate monitoring data to be required in addition to the "one point in time inventory" data when changes in livestock grazing preferences were implemented.

As a result the 14 LUPs for the State made the following types of decisions:

1. Livestock Grazing
 - a. Identified objectives for vegetation goals
 - b. Determined where livestock would and would not be allowed.
 - c. Identified the degree of range improvements deemed to be necessary to meet LUP objectives
 - e. Identified Kind of livestock to be permitted by area
 - f. Identified goals for authorized levels of livestock use
 - g. Identified "initial levels" of authorized livestock grazing
 - h. Identified that "monitoring" would be used to adjust livestock grazing if it was determined that the existing authorizations were not meeting the LUP objectives

2. Wild Horse and Burros
 - a. Identified Herd Management Areas
 - b. Identified "initial levels" of WH&B
 - c. Identified that "monitoring" would be used to adjust WH&B levels.

3. Wildlife
 - a. Identified habitat objectives by kind and area of wildlife
 - b. Identified "reasonable numbers" of wildlife by kind and area
 - c. Identified aquatic habitat objectives

This approach to our LUP decisions was again challenged in Federal District Court (NRDC v Watt) or the Reno Grazing EIS lawsuit. This suit challenged both the National Environmental Policy Act (NEPA), and the Federal Land Policy and Management Act (FLPMA), compliance of BLM LUP/EIS. They also alleged that the BLM policy of not using "inventories" for allocation was illegal. That our LUP decisions were "...delaying indefinitely management actions needed to improve unacceptable range conditions."

The Federal Judge ruled that he ... "refused to become the Range Manager for the State of Nevada," he also stated the BLM had clearly stated that "monitoring" would be used to determine what changes in existing management of the public lands would be implemented. He "invited" the plaintiffs back into his court room if the BLM did not implement their approved LUPs.

Subsequent to this ruling the BLM Director issued a policy direction which stated that within 5 years of issuance of the Record of Decision-and the Rangeland Program Summary the BLM would do the following on all Intensive (I) and Maintenance (M) category allotments:

1. establish multiple use allotment specific objectives
2. implement a monitoring program to assess the obtainment or lack there of in meeting the LUP objectives
3. based upon an analysis of the monitoring data either
 - a. enter into a livestock use agreement which implements the needed changes in existing management or
 - b. issue a decision which implements the needed changes in management or
 - c. document the file if monitoring establishes that existing management is meeting the LUP objectives

The attached table shows the reported progress of this effort for Nevada as of 11-05-90.

THE NEVADA ALLOTMENT EVALUATION PROCESS

To meet the goals established by BLM policy the Nevada BLM has implemented a interdisciplinary allotment evaluation policy that creates the opportunity for interested parties or affected interests to become involved in the process.

At the beginning of the fiscal year each resource area sends a listing of the allotment evaluations that they will be working on to their mailing list of interested publics. This letter requests that if you want to become involved or if you want to identify yourself as an affected interest on a particular allotment to notify the authorized office in writing. Additionally the letter requests that if you have information that will assist the BLM in determining if the current management is or is not meeting the LUP objectives to please provide this information.

As this list is developed the area office will then keep you involved in the consultation, cooperation and coordination process on a particular allotment(s).

The evaluation process consists of five basic parts which are:

1. What do you want? (Allotment specific objectives for those LUP objectives that are or may be impacted by grazing animals)
2. Data analysis
3. What's broke (and what broke it) and what's not broke?
4. How do you fix what's broke?
5. Management Decision

NEVADA'S MULTIPLE USE DECISION PROCESS

At the conclusion of the evaluation process Nevada BLM uses a Multiple Use Decision process to establish:

1. The terms and conditions of the grazing permits.
2. The Appropriate Management Level for Wild Horses and Burros that occur within the allotment.
3. Any recommendations for wildlife populations or habitat management actions required if it is determined that these action are necessary.

This format addresses the above items in a manner that must be consistent with the LUP for the area.

Should any protests or appeals be initiated as a result of these decisions it is intended that they all be consolidated for the purpose of holding one hearing on the issues. The rationale for this is that the issues of livestock grazing, wild horse and burro management and wildlife issue are all interrelated. The basis of the decision is monitoring information collected on the resources of the allotment. Any adjudication of these decisions should consider all the users of the vegetation resources, rather than sperate forums adjudicating single issues.
(See attached flow sheet for more detail)

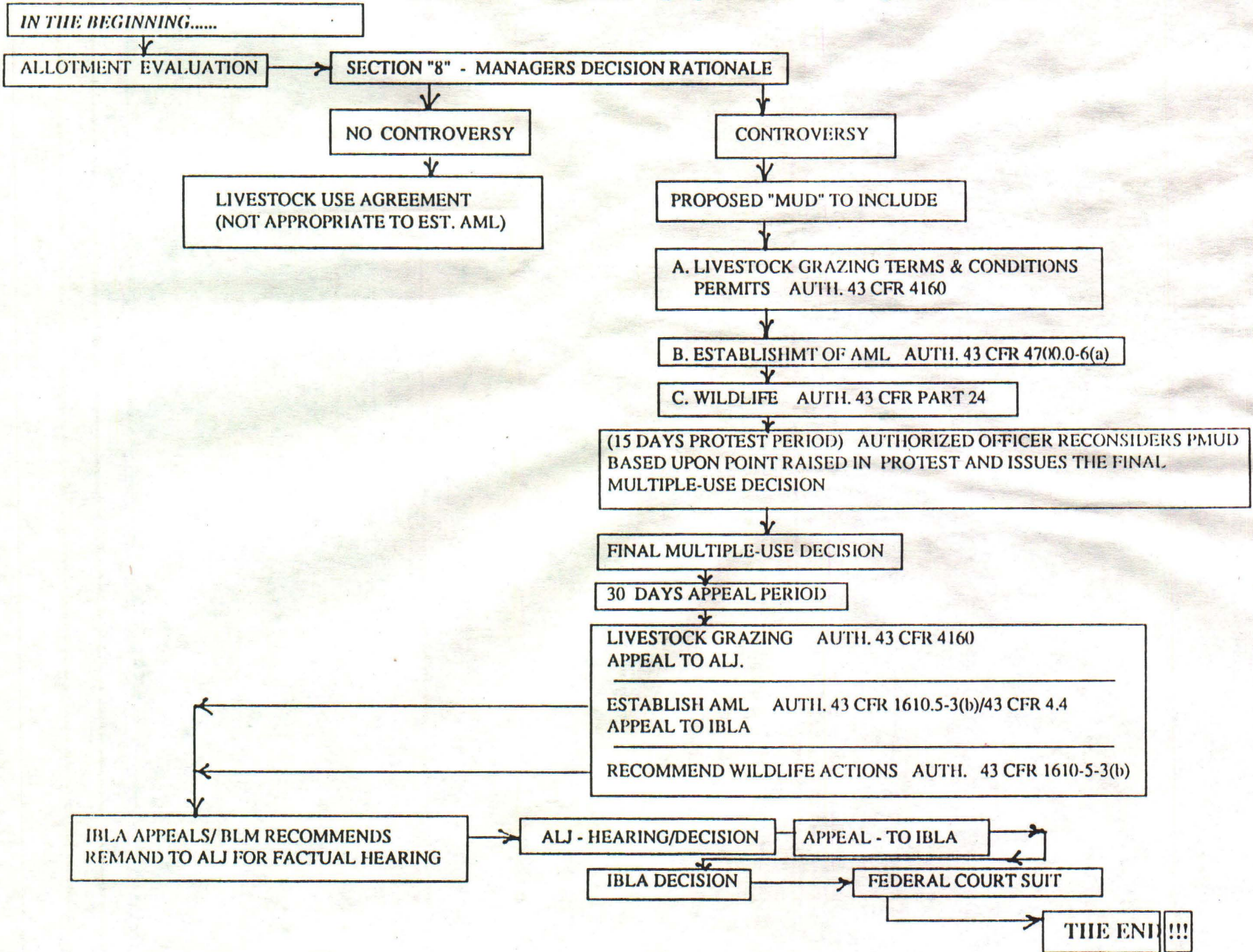
TABLE 3
SUMMARY
STATUS OF MONITORING BY LUP AREA (UPDATED 11-05-99)
DECISIONS, AGREEMENTS, DOCUMENTATION TO THE FILE

DISTRICT	DATE OF ROD	DATE OF RFS	TOTAL ALLOTS	TOTAL DECISIONS	AGREEMENTS	FILE	TOTAL DECISIONS	AGREEMENTS	FILE	TOTAL DECISIONS	AGREEMENTS	FILE
ELKO												
WELLS	7/86	7/86	33	24	0	0	46	0	3	18	0	0
ELKO	4/87	4/87	123	59	0	0	47	0	0	12	0	1
HINNEBUCCA												
PARADISE-BENIG	3/82	10/82	67	18	0	0	16	12	0	17	0	0
SONOMA-BERLACH	3/82	10/82	33	7	0	0	0	0	0	17	1	0
CARSON CITY												
VALLEY	6/86	7/86	23	9	2	0	0	11	0	10	17	0
TRNO	12/82	5/84	20	4	0	0	4	3	0	12	12	0
LAWTONSH	7/85	10/85	22	5	0	0	18	12	2	0	0	0
TRNO	12/82	5/84	15	6	0	0	2	2	0	3	0	0
ELY												
DORELL	7/83	1/87	34	10	0	0	12	0	0	11	0	0
EDWIN	7/87	7/88	21	29	0	0	17	1	0	15	0	0
LAS VEGAS												
CALLENTE	7/82	7/82	39	23	17	0	12	0	0	14	12	0
CLARK	1/84	1/85	45	15	0	0	2	0	0	19	0	0
SOUTHERN MTE	10/86	3/86	5	1	0	0	0	0	0	1	0	0
BATTLE MOUNTAIN												
BRUSHONE-BURESA	11/87	10/88	59	24	0	0	11	0	0	14	0	0
TOMPAN	3/81	1/82	20	20	12	0	0	0	0	0	0	0
ESPERALDA-BUNTE	10/86	7/87	14	5	0	0	0	0	0	4	0	0
NEVADA TOTAL			504	258	46	44	275	53	25	145	55	0

COMMENTS: 1991 LUP COMMITMENT IS TO MONITOR ALL "I" AND "M" ALLOTMENTS
TOTAL "I" AND "M" IS 541 ALLOTMENTS
COLUMN TOTALS DON'T MATCH ROW TOTALS. DISTRICTS WILL
MAKE APPROPRIATE CORRECTIONS.

if this is not readable why enclose

MULTIPLE USE DECISION PROCESS



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