

August 13, 1982

MEMORANDUM

To: Chief, Division of Resources  
Through: Chief, Branch of Biological Resources  
From: Wild Horse and Burro Specialist  
Subject: Wild Horse/Burro Herd Management Area Plans

The attached document is a HMAP prepared by the Las Vegas District for the Nevada Wild Horse Range. This plan is the first WH&B activity plan which has been officially submitted to this office since my arrival in September of 1980. I have reviewed this plan and generally find it totally unprofessional and unacceptable as an official Bureau document. As written, this plan is nothing more than a justification for removing wild horses. HMAPs of this type have resulted in significant and valid criticism from wild horse interest groups for many years.

In general, the attached plan lacks the specificity required to establish management direction, lacks coordination between and a logical sequence of development for the various sections and lacks a plan of action for sound positive management of the animals and their habitat. It is interesting to note that in this document, which is intended to identify a specific wild horse management program on the NWHR, thirty eight per cent of the plan's content is comprised of title page, table of contents and signature pages.

I have selected a few specific examples of the problems addressed above to illustrate my concerns. My intent in highlighting these problems is to demonstrate the need for technical overview of HMAPs at least until some prototype plans have been developed.

Problem 1

Section III B, of the plan states that no vegetative inventory has been completed and that the grazing capacity will be determined through monitoring studies. However, section IV B(2) identifies a plan objective of managing for a number of wild horses which the range can support as determined by estimating available suitable forage within 4 miles of water. This type of estimation involves a vegetation height classification as well as application of suitability criteria. Since no vegetation inventory has been conducted, such an estimation is an exercise in clairvoyance.

In addition to the above, the monitoring studies to be used in establishing the grazing capacity are not identified in sufficient detail in Section VIII A and B (Studies and Assessment) to provide guidance in both the type and frequency of studies to be used.

#### Problem 2

Section III D(1)(a) of the plan states that the wild horse herd is in direct conflict with mule deer and bighorn sheep. This section also states that horses are utilizing the same forage species as antelope and uncontrolled horse population increase and expansion will likely result in reduced productivity of bighorn sheep and mule deer.

There is absolutely no data presented in the plan to demonstrate that wild horses are in direct conflict with any of the other herbivores. In fact, such a statement as it relates to mule deer is contradictory to available research on wild horses and mule deer diets.

In addition, there is no correlation between wild horse population increase and productivity of bighorn sheep and mule deer. More important however, is the fact that data presented in the plan regarding wild horse productivity indicates a reproductive rate of only 8 or 9 per cent. With reproductive rates this low, it is doubtful if wild horse population increase has been significant.

#### Problem 3

Section III B(2) discusses range condition and trend on the NWHR. Since studies were not established until 1981, this narrative focuses upon apparent trend and apparent condition. The conclusions drawn in the plan regarding apparent trend are not based upon established procedures for estimating this parameter and there is no such thing as apparent condition in rangeland evaluations.

#### Problem 4

Section III D(1)(b) discusses a problem with suspended particulates which are interfering with visibility and weapons testing by the military. This section goes on to claim that the increased dust is a direct function of reduced ground cover created by overgrazing by wild horses. This type of statement not only strains the limits of feasibility but defies reasonable logic. With wild horse densities of one animal per 373 acres, it is simply impossible for horses to have reduced ground cover to the extent that dust is now causing visibility problems.

#### Problem 5

Section IV (Objectives) identifies all of the objectives for managing wild horses and their habitat on the NWHR. Unfortunately, the objectives presented are primarily a restatement of law or don't say anything specific. For example, the objective for water on the NWHR is

to maintain present waters and not to develop new waters. What is needed is a listing of the waters to be maintained, the type of maintenance required and a maintenance schedule.

#### Problem 6

Section V (Management Methods) is supposed to identify the specific management actions to be undertaken by BLM to achieve the plan objectives. However, the NWHR plan simply talks about reducing wild horse numbers.

#### Problem 7

Section VIII (Studies and Assessment) is supposed to identify the specific studies and their scheduling that are to be used to evaluate the effectiveness of the management actions in meeting the objectives of the plan. However, the NWHR plan simply states that monitoring studies have been started and that the Fish and Wildlife Service is interested in studying population dynamics on the NWHR.

The above problems exemplify what I believe reflect a major deficiency and lack of understanding as to the purpose and function of HMAPs. These problems also demonstrate the reason why BLM is looked upon as only being interested in getting rid of wild horses, rather than managing the animals.

It is my understanding that one of the primary functions of my position in Nevada is to bring an advocacy role to WH&B management and to develop a positive management program for the animals in an attempt to reduce or minimize adverse criticism of BLM's management efforts. As a result, I recommend that for the present time, all wild horse HMAPs which are developed in Nevada, be reviewed in the Nevada State Office prior to being implemented at the District level. If desirable, this review could be limited to the first two or three HMAPs developed by each district. By adopting such a policy, I believe that considerable improvement could be made in our HMAP program with a corresponding reduction in criticism of our management efforts.

MFRei:VMc  
08/13/1982