



Gold Butte *mailed* ^{pr 2} 11-7-89

ANIMAL PROTECTION INSTITUTE OF AMERICA

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CLAUDE,
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November 7, 1989

Runore Wycoff
Area Manager
Stateline Resource Area
4765 Vegas Drive
Las Vegas, NV 89126

Re: GOLD BUTTE GRAZING EVALUATION

Dear Mr. Wycoff:

This letter is in response to the grazing evaluation of the Gold Butte Allotment and the proposed grazing system and recommendations for that allotment. We realize there is a problem with burros in the recreation area of the Park Service and that this has created a conflict between the two agencies. We believe in this particular case that BLM should retain jurisdiction over the burros.

We agree that the burros need to be managed and controlled in a way that grants them full protections while eliminating their invasion of the recreational area as well as any destructive habitat impact on the desert tortoise critical habitat areas.

We're at somewhat of a loss in responding to this particular allotment. It appears to us that only by extensive support systems such as fences, pipelines, construction of a corral, drilling a well and diverting water from riparian areas are livestock able to continue to graze here. While we agree that 350 burros appear to be too many and we do not object to a reduction based on the conflicts above and the utilization data in the key areas #1 and #2, we question that the number being left is in fact the optimum number. Our understanding from previous data is that 62 is the minimum [rather than the optimum] of a 62-150 range. We believe the IBLA ruling requires that an optimum number remain when excess has been determined.

Along the same lines, Page 2 refers to an initial number of burros as the 1983 level. This as you know is no longer a valid indication of how many burros the range will support. The indicator is your range data that determine excess and the inventories that determine the optimum number for this herd area. The original objective to provide 3586 AUMs is being changed significantly! The chart in Section VI (p. i) lists the objective (AO-7) as NOT being met while Objectives #8 and #9 have been met. We don't see how AO-8 (protect burro habitat) can be met if the objective was to provide 3,586 AUMs now reduced to 744 AUMs. Should we assume the first was totally unrealistic and without basis and that the current assessment is in keeping with the carrying capacity of the burro critical habitat? If so we would expect any removals to be made from the area of heavy-severe usage in the key area #1 and #2 and not from the area of Quail Bay (Area #3).

The lack of data on actual livestock usage which allows you to use licensed usage numbers doesn't make sense to us. How can you make any livestock adjustments if you don't know how many cattle are responsible for the utilization levels being measured? However, this is our first experience with an ephemeral rangeland assessment and we're not quite sure how it works. It strikes us, though, that this requires monitoring actual usage very closely not the opposite.

The concentration of cattle in riparian areas is alarming to us since it threatens the habitat of all wildlife species. Mentioned in the evaluation were Mockingbird, Aqua Chiquita, Gann, Walker, Summit and Connelly Springs.

The Red Bluff Springs is due for winter/spring grazing usage and we question whether there is a contradiction with riparian objectives in the several mitigating measures needed to allow this. To suggest that a fence will simply washout, leads us to suspect that there has been a total loss of watershed above and flash flooding moves rocks and soils down the wash. But our lack of information prevents us from commenting further on this situation. In this case we depend on your soils and hydrology experts to give their professional opinion on what is needed to repair this situation to save the water system in keeping with the minimum objectives for riparian habitat as listed in BLM's national Plan 2000.

It is unclear to us how the recommended grazing system will obtain the several objectives listed for this allotment.

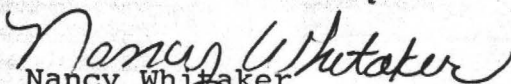
API's own objective in the allotment evaluation process is to insist that the wildlife objectives for raptors and non-game species as well as riparian habitat protections as set

forth in that Plan 2000 be incorporated into current grazing decisions and the formulation of allotment management plans. There are no references to the population of nongame species or raptors that occupy this allotment.

We note that the list of preparers include several wildlife biologists so that this oversight is not one of inadequate staffing. Your Resource Area appears to be well staffed for implementing Plan 2000 in your area.

Thank you for granting API this opportunity to respond to this grazing allotment. We do want to stay in touch with you on the fate of the burros there.

Sincerely,


Nancy Whitaker
Program Assistant