

To: Austin/Tonopah Ranger District
Steven Williams- District Manager
John Rademacher
PO Box 130
100 Midas Canyon Rd
Austin, NV 89310

November 15, 2006

Re: Notice of Proposed Action and Opportunity to Comment
Wild Horse and Burro Appropriate Management Levels (AMLs)
October 2006

Dear Mr. Williams/Mr. Rademacher:

After reviewing the information contained within the Notice of Proposed Action and Opportunity to Comment issued by the Austin/Tonopah Ranger District in October 2006 regarding the establishment of wild horse and burro appropriate management levels within the wild horse territories administered from this district, I have concluded that a wide variety of issues have yet to be addressed.

While I fully support the establishment of AML's for wild horse and burros to ensure proper rangeland health and balanced multiple-use implementation, the information that was provided within this notice lacked considerable data to properly evaluate the proposal.

The summary of my position is that more analysis is needed before decisions of this magnitude are implemented, and I strongly recommend that the Environmental Impact Statement be done before attempting to progress any further on this proposal without actually evaluating, monitoring and providing relevant data before a determination is made.

I greatly appreciate the opportunity to be involved in the proper management, administrations, and decisions regarding our national resources and public lands.

Sincerely,

NAME REMOVED

After reviewing as much information as was made available about the proposed appropriate management levels (AML's) for the following Wild Horse Territories (WHT); Butler Basin WHT, Kelly Creek WHT, Monitor WHT (No. and So.), Little Fish Lake WHT, and Stone Cabin WHT, I find that the proposal is unacceptable for a number of reasons.

The first, and most glaring, is the lack of data provided.

This proposal covers hundreds of thousands of acres of rangeland, watershed and riparian areas, and a wide variety of multiple-use issues. Through its implementation, the future of wild-free roaming horse and burros will be permanently established as well as many rangeland health issues, wildlife, livestock grazing, etc.

Proper administrations, implementations, and thriving multiple-use management is the objective. Failure to provide adequate data, information and monitoring of resources prevents this objective from being accomplished.

Also, many of the factors cited within this proposal, based on the evidence presented, appear to be non-compliant with federal laws, regulations and standards. Attempting to move forward and establish this proposal without addressing public concerns and questions will only lead to wasted resources on all levels.

This proposal is based on the premise that demands wild horse and burro AMLs conform to multiple-use relationships within the territories. Yet it fails to provide any significant information on these other various factors, allocations, impacts or actions being considered and/or implemented to achieve a thriving ecological balance.

The currently proposed appropriate management levels are too low and the results of permanently establishing them at this level violates too many laws, mandates and regulations, to say nothing of the actual harm to the wild-free roaming horses and burros that are specially designated components of these territories.

The Wild-Free Roaming Horse and Burro Act of 1971 (Public Law 92-195) mandates that: “they are to be considered in the area where presently found, as an integral of the natural system of public land”.

The Federal Land Policy and Management Act of 1976 states: “All actions by the Secretary concerned under this Act **shall be subject to valid existing rights**” (emphasis added).

“Nothing in this Act shall be deemed to repeal any existing law by implication”

“Nothing in this Act, or in any amendment made by this Act, shall be construed as terminating any valid lease, permit, patent, right of way, or *other land use right or authorization existing on the date of approval of this Act*” (emphasis added)

Austin/Tonopah Ranger District

1 of 7

WHT AML Proposal-2006

The area within this proposal covers 1,667,195 acres of public land, 557,969 acres of WHTs and 1,109,226 acres of HMAs through co-management with the Bureau of Land Management.

The Sevenmile WHT (5,710 acres)

The Dobin WHT (48,711 acres)

The Kelly Creek WHT is co-managed with BLM’s No. Monitor HMA* (32,414 total acres)

The Butler Basin WHT is co-managed with BLM's Sevenmile* HMA (151,174 total acres)
The Monitor WHT (North and South) interacts with Little Fish Lake WHT and is co-managed with BLM's Little Fish Lake* HMA and Saulsbury HMA** (609,701 acres)
The Stone Cabin WHT is co-managed with BLM's Stone Cabin HMA, Hot Creek HMA and Reveille HMA (569,154 acres).

*These are managed as a Complex (Fish Creek Complex) which is comprised of: Sevenmile HMA, Little Fish Lake HMA, No. Monitor HMA, Butler Basin WHT, Little Fish Lake WHT, and Fish Creek HMA (250,331 acres).

** These are managed as a Complex (Saulsbury Complex) which are comprised of: Saulsbury HMA, Stone Cabin HMA, Reveille HMA, Monitor North and South WHT.

Despite the Wild Horse Territories consisting of 552,259 acres, only 147,812 acres is being established for wild horse and burro use. This is only 26% of the lawfully established wild horse territories and denies horses and burros ANY access or utilization of the remaining 74% (410,157 acres).

One significant fact that has been omitted and was not addressed despite requests, is the amount of acreage that divides North Monitor WHT and South Monitor WHT. How can proper perspective be achieved without providing this basic value? 100 horses on an acre of land provides a reasonably fair perspective that there's an extreme overpopulation. One horse per 3,000 acres puts the proposed AML in perspective. The information on established acreage of these two management areas needs to be provided for proper management and administration on an annual basis, not just the suitable winter habitat.

The Public Rangelands Improvement Act of 1978 (Public Law 95-514) states:
"...it's goal of protecting wild-free roaming horse and burros...but that certain amendments are necessary thereto to avoid excessive costs in the administration of the Act...(and) because they exceed the carrying capacity of the range."

How can there be a "carrying capacity of the range" if the acreage of the range is an unreported?

Much of the assertions within this proposal are illogical, contradictory, incomplete and even misleading. For example, pg. 10, #5 states:

"Little Fish Lake WHT is limited by winter habitat."

Yet, pg. 15 states:

"...Little Fish Lake WHT have a substantial amount of winter habitat."

From the analysis offered in this proposal, the majority of the horses don't spend winters in the WHTs but on BLM HMAs. If the horses move to the HMAs in the winters, why is winter forage allocations and habitat the basis for AML determination when wild horses aren't there? This illogical approach included reducing available habitat by elevations grazed in winter. Since the

wild horses occupy and graze the WHT in the summer, why would USFS model rangeland usage on absent wild horses? Shouldn't a proper evaluation evaluate when wild horses *are utilizing* the range?

Concern was expressed within this proposal about "overstocking" the adjacent Saulsbury HMA. The current AML for Saulsbury's 135,000 acres is a maximum of 40 horses. This equates to over 3,000 acres per horse. Overstocking? What else is "stocking" this land that this kind of population number would produce overstocking?

Pg. 8 of this proposal states:

"Without AMLs established on five of the seven territories, these populations are increasing without any means of control..."

This is an inaccurate statement which seems to be included with the intent to deliberately mislead. Wild horses have and will continue to be gathered as population levels require.

Many of the WHT and Herd Management Areas (HMAs) through association and co-management, have been aggressively gathered in recent years. There were two "official" wild horse and burro gathers done just in the past year alone: one in July 2005 and again in February 2006, which removed almost 300 more horses after the 2005 July gather, where the removal numbers are currently unknown.

This area was also gathered in 2000 where 600 horses were removed, and has had two "emergency gathers" in that time where the removal numbers are currently unknown. To re-cap, there has been a gather in 2000, two more between 2000 and 2004, a gather in July 2005 and another gather in February 2006. That's a lot of removals.

Another point of contention is that some of the census information and population levels offered within this proposal were taken from 1994. This was also summer usage when utilization levels are at their highest. It would follow that current information and population numbers should be utilized in determining AML.

The Environmental Assessments (EAs) that were published about the last two gathers stated that removing wild horses from the area would improve rangeland resources.

What has been the results of this aggressive gathering to rangeland resources and riparian areas?

On pg. 18, Monitoring, it states:

"Recent vegetation assessments have been completed within the project area."

Via e-mail, John Rademacher stated that evaluations had been done in 2005-2006.

What kind of evaluations and could some actual measurements and utilization levels be provided?

It goes on to say,

“Little Fish Lake WHT is the only exception.Post gathering monitoring will be conducted within the Little Fish Lake WHT to determine if the AML is increasing range condition.”

This area was gathered in February 2006. Was this recent monitoring information collected after this gather? What changes in range condition have been noted?

From my understanding of “rangeland recovery”, excessive utilization and deterioration of range can take quite a long time to recover from, especially in the more arid environments. This statement was issued via e-mail that, “Monitoring indicates that most of the wild horse territories are in an acceptable condition except for Little Fish Lake.”

Due to the continuous and heavy wild horse removals in this proposed area, all based on “excessive populations” causing deterioration of range, and most notably, the two gathers in the last year, wouldn’t the rangeland be in much less acceptable condition? How can it recover that quickly from all those horses that have been removed?

Also, how does this reporting of acceptable conditions via e-mail versus the assertion on pg, 8 that states:

“there are a number of sites which are not meeting current Forest Plans for ecological condition due to overgrazing”

In the Fish Creek Complex Wild Horse Gather, EA# NV062-EA05-04, pg. 23, it states: “Water quality data has not been collected within the Willow Ranch, or Wagon Johnnie allotment or portions of the Complex administered by USFS.”

Pg. 24, 3.7 Soils states:

“No surveys or inventories have been completed at this time.”

The Public Rangelands Improvement Act of 1978 (Public Law 95-514) states:

“...shall be kept current (rangeland data and monitoring) on a regular basis so as to reflect changes in range conditions; and shall be available to the public.”

The amount of livestock grazing allotments listed within this proposal is of considerable size. No substantial information about these allotments has been provided such as total AUM allocations, current-use allocations, the actual acreage of these allotments that affects the WHT, water data such as number of water sources currently being utilized, rate and flow, streambank conditions, measurements of key riparian species, soil measurements, vegetative ground cover, etc.

Having e-mailed Mr. Rademacher concerning this omitted information, the reply about livestock grazing acreage within the WHTs was as follows:

“Therefore it is nearly impossible to determine the amount of livestock grazing within each of the WHTs.”

This raises the question, how does USFS determine grazing fees within these allotments if it is nearly impossible to tell how much acreage is involved and where it is located?

Due to the fact that so much of the WHT has been removed from wild horse and burro allocations and utilizations (74%), while livestock grazing appears to be prolific on the majority of the available land, it raises concerns as to whether proper protection of wild horse and burro resources is being implemented or considered in this proposal.

Furthermore, if rangeland health is at such an “intensive-level” of need that wild horse and burro AML must be set at 8 (which indicates more than 8 horses on 32,000 acres causes range deterioration associated with excessive populations), then serious questions must be raised as to the current rangeland health and again points to the need of a EIS.

This AML of 8 wild horses is the currently proposed AML for the Kelly Creek WHT, based on an established AML from BLM regarding the North Monitor HMA. In this proposal it states that BLMs AML is established at 16. Yet, according to BLM Herd Management Area Statistics, the AML has been established at only 8.

There is also the issue of *maintaining* an AML at this incredibly low level. The mandates of wild horse management require a “minimum feasible level” as well as protection of undue harassment. In order to maintain this level of wild horse populations, the need to conduct gathers would be constant, almost annually, unlike the current recommended 4 year cycle, to say nothing of the severe genetic viability issues that surround a herd of 8.

The proposed wild horse AMLs levels are very minimal throughout this proposal. It is asserted that these minimal levels are necessary to protect rangeland resources, deterioration, impacts and excessive utilizations. If wild horse AMLs must be set this low to ensure proper rangeland functions, has any adjustments or considerations been made regarding the re-evaluation of livestock grazing allotments, who are well noted for their destructive rangeland impacts when numbers are excessive?

To illustrate the need of more thorough monitoring and why an EIS needs to be done, pg. 8 of this proposal states:

“As evidence of this lack of balance, there are a number of sites which are not meeting current Forest Plans for ecological condition due to overgrazing, and overgrazing is causing adverse effects on watershed condition in certain areas.”

This statement implies without actually providing any verifiable data that it is the wild horse populations that are heavily contributing too or are solely responsible for these adverse effects.

Yet, according to the 2005 Fish Creek Complex gather proposal (EA#NV062-EA05-04), pg. 23 states: “In most cases, wild horses visit water sources briefly.”

This behavioral pattern is often noted with wild horse use as well as their rather large grazing perimeter to water sources, unlike cattle who tend to congregate in a very fixed pattern on riparian areas.

Also needed is factual data as to what sites, how many is a “number”, what is the ratio of these sites to proper functioning ones, what are those standards? What is the most current stubble height measurements on key riparian species?

If a number of sites are not meeting current standards, what other considerations and adjustments are being made?

What techniques are being employed that separate the wild horse utilization versus cattle and wildlife, as well as their respective impacts and damages?

Data also needs to be considered and made available to the public regarding wildlife populations in the area, current resource allocations for wildlife, as well as more data regarding cultural resources.

On pg.17 of this proposal, it states that:

“Taking no action to set AML will increase impacts to archaeological sites because the horse populations appears to be increasing and there is a positive correlation between total numbers of horses and the amount of damage sites undergo.”

Again, horses have been gathered twice in this Complex in the last year. Regardless of establishing AML, the areas are gathered, horses are removed, and relatively stable range conditions have and will continue to be achieved. Taking no action to establish AMLs will not increase damage to archaeological sites because horses are still gathered.

This statement implies many things without actually providing real data needed to determine REAL rangeland standards. Horse populations are always increasing, though due to the amount of recent gathers, this increase “rate” can’t be as great as insinuated.

The purpose of establishing AMLs is to determine what population levels begin to actually impact the sites. Undetermined numbers of excessive horses, or anything for that matter, will impact resources. There really is no room in proper rangeland management for blanket statements and insinuations. We need facts.

Furthermore, due to the heavy livestock grazing within the proposed areas, as well as the well-documented impacts cattle have to rangeland resource (trampling, riparian area degradation, minimal grazing perimeters from water sources), what impacts have been noted to cultural sites

from livestock grazing? There must also be a positive correlation between total numbers of cattle and the amount of damage sites undergo as well.

An Oil and Gas Assessment proposal, NV063-EA06-092, released in October 2006 which covers a great deal of the areas involved within this AML proposal contains the following information. According to this assessment, pg. 4-3 and 4-4, Section 4.3.1.3 under the heading of Cumulative Impacts, it states: “Presently, impacts to cultural resources from activities on public lands are minimal due to avoidance or development of mitigation measures.”

This statement is more factual, not suggestive, as the one within this proposal.

Yet, according to pg. 8 of this proposal, the following statement is issued:

“Note impacts of horses on the site integrity of archaeological sites”.

Yet, it goes on to say that many of these impacts are intermingled with that of cattle, wildlife and introduced wildlife. Have any techniques been developed or are being researched that can provide verifiable differences between these species?

In this same assessment, Table 3.3-1, Archaeological Sites Recorded, pg. 3-6, indicates that many of the cultural sites within the affected areas of this proposal are either ineligible or currently unevaluated. This too, points to the need for an EIS to be done, to help increase data about these important resources and values.

The aforementioned EA also shows that Oil and Gas Leasing is being proposed, evaluated and considered. Again, this shows the need for a comprehensive analysis of rangeland and multiple-use factors.

An Environmental Impact Statement (EIS) needs to be performed to collect and provide more information before AMLs are established and permanently altered. A wide variety of questions must be addressed and provided to the public regarding the status, impact and affect of this proposal on public lands.

Appendix 1

Wild Horse Territories

Kelly Creek

Co-Managed with BLM No. Monitor HMA

Kelly Creek WHT Acreage: 20,902 acres

No. Monitor HMA Acreage: 11,512 acres

Combined Acreage: 32,414 acres

Suitable Winter Grazing Acres: 7,950 acres*
 *horses do not reside within the WHT during winter season
 yet this is the standard they are using to determine AML

Kelly Creek AML: 8 horses
 No. Monitor AML: 8 horses (As of 2/06)

Maximum Assigned Wild Horse AUM's for Kelly Creek WHT: 96
 Maximum Assigned Wild Horse AUM's for No. Monitor HMA: 96

Combined Wild Horse WHT and HMA Maximum AML: 8 horses
 Combined Wild Horse AUM's @ Maximum AML: 96

Acres per horse: 4,051 acres

Population:
 FS Kelly Creek WHT Winter Census (Date Unknown) 0
 FS Kelly Creek WHT Summer Census (Date Unknown): 10-49
 BLM No. Monitor HMA: (As of 2/06) 7

Current Estimated Combined Population Unknown
 Due to the recent gather, population is probably at 7 horses within the combined areas of the WHT and HMA.

No. Monitor HMA
 Last Gathered 2/1/06 thru 2/14/06
 Planned to Gather: 42
 Actually Gathered: 30
 Planned to Remove: 39
 Actually Removed: 30

It is unknown if Kelly Creek WHT population was included in this gather but the probability is high considering horses winter in the HMA which is when the gather was conducted.

Grazing Allotments in WHT: _____ Grazing Allotments in HMA:

Kelly Creek/North Monitor
 Allotment
 Summer (Vacant)*

Willow Ranch Allotment
 Public Acres 51,298
 Private Acres 2,007
 Total Acres- 53,305
 Total AUM's 3,621

*states it is not authorized
 for grazing

Acreage of Grazing Allotments within HMA boundaries is unknown at this time.

Butler Basin WHT

Co-Managed with BLM Sevenmile HMA

Butler Basin Acreage: 53,523 acres
Sevenmile Acreage: 97,651 acres
Combined Acreage: 151,174 acres.

Suitable WHT Winter Grazing Acres: 4,400 acres*
*horses do not reside within the WHT during winter season
yet this is the standard they are using to determine AML

Butler Basin AML: 30-50 horses (This is inclusive of BLMs AML)
Sevenmile AML: 60-100 horses (Reported in FY06 Herd Statistics)

Maximum Assigned Wild Horse AUM's for Butler Basin WHT: 600
Maximum Assigned Wild Horse AUM's for Sevenmile HMA: 600

Combined Wild Horse WHT and HMA Maximum AML: 100 horses
Combined Wild Horse AUM's @ Maximum AML: 1,200

Acres per horse: 1,511 acres

Population:

FS Butler Basin WHT Winter Census (Date Unknown) 89
FS Butler Basin WHT Summer Census (Date Unknown) 178-259
BLM Sevenmile HMA: (As of 2/06) 33

Butler Basin WHT and Sevenmile HMA were
Last Gathered 2/1/06 thru 2/14/06

Planned to Gather: 143
Actually Gathered: 84
Planned to Remove: 90
Actually Removed: 84

This area was gathered twice, first in July of 2005 and then again in February 2006.
Reports indicate that 357 horses were removed from this area during these 2 gathers.

Grazing Allotments in WHT: _____ Grazing Allotments in HMA:

This WHT is authorized for both
winter and summer grazing.

Monitor Winter

Sevenmile Allotment

Winter	Public Acres-	89,541
	Private Acres-	879
<u>South Monitor</u>	Total Acres-	90,420
Vacant (Summer)	Total AUM's	5,573

North Monitor
Listed in BLM
EA# NV063-EA06-092

	<u>Sweeney Wash Allotment</u>	
	Public Acres-	6,985
	Private Acres-	0
	Total Acres-	6,985
	Total AUM's	478

White Rock
Vacant (Summer)

Horse Haven (or Heaven)
Summer

Combined Public Acreage:	96,526
Combined Total Acreage:	97,404
Sevenmile HMA Acreage:	97,651
Total AUM's Available:	6,051
Maximum WH AUM's	600
Remaining AUM's:	5,451
Percentage Allocated for Wild Horse Use	10%

Total Acreage of Allotments within HMA's and WHT's boundaries are unknown at this time.

Monitor WHT

(Divided into North and South Areas)

Monitor (North and South) 339,428 Total Acres
Monitor (North and South) Combined AML: 51-90 horses
Acres per horse: 3,771 (maximum Appropriate Management Level)
Assigned Maximum AUM's for wild horses: 1,080

Monitor (North and South)	339,428 Total Acres
Little Fish Lake WHT	88,235 Total Acres
Little Fish Lake HMA	28,739 Total Acres (FY06 reported 87,545 Herd Area acres transferred)
<u>Saulsbury HMA</u>	<u>153,299 Total Acres</u>

Total Combined Acres: 609,701 Total Acres

Monitor (North and South) acres per horse: 3,771
 Little Fish Lake WHT acres per horse: 3,151
 Little Fish Lake HMA acres per horse: 736
 Saulsbury HMA acres per horse: 3,832

Total Combined Average acres per horse: 3,094

Appropriate Management Levels

Monitor-No. WHT 20
 Monitor-So. WHT 70
 Little Fish Lake WHT 28
 Little Fish Lake HMA 39
 Saulsbury HMA 40

Total Combined AML 197 Total Horses @ Maximum AML

Maximum Assigned Wild Horse AUM's for Monitor-No.WHT: 240
 Maximum Assigned Wild Horse AUM's for Monitor-So.WHT: 840
 Maximum Assigned Wild Horse AUM's for Little Fish Lake WHT: 336
 Maximum Assigned Wild Horse AUM's for Little Fish Lake HMA: 468
 Maximum Assigned Wild Horse AUM's for Saulsbury HMA: 480

Total Combined Wild Horse AUM's
 @ Maximum AML: 2,364

Monitor (North):

Interacts with Little Fish Lake WHT and,
 Co-Managed with BLM Little Fish Lake HMA

Monitor (North) Acreage: N/A acres
 Little Fish Lake WHT Acreage: 88,235 acres
 Little Fish Lake HMA Acreage: 28,739 acres (116,284 HA acres)
 Combined Acreage: 116,974 acres (not including any No. Monitor acres)

Suitable Monitor-No. Winter Grazing Acres: 27,032 acres
 Suitable Little Fish Lake Winter Grazing Acres: 29,200 acres
 Little Fish Lake HMA Acres: 28,739 acres
 Total Combined Minimum Acreage: 84,971 acres

BLM reported 87,545 acres transferred from Little Fish Lake HA in FY06.
 Currently unknown where acreage went. This is ALL acreage listed as the HA.

Monitor-No. WHT AML: 11-20 horses (Based exclusively on winter habitat)
 Little Fish Lake WHT 16-28 horses (Based exclusively on winter habitat)

Little Fish Lake HMA AML: 39 horses (As of 2/06)

Maximum Assigned Wild Horse AUM's for Monitor-No.WHT: 240
Maximum Assigned Wild Horse AUM's for Little Fish Lake WHT: 336
Maximum Assigned Wild Horse AUM's for Little Fish Lake HMA: 468

Combined Wild Horse WHT and HMA Maximum AML: 87 horses
Combined Wild Horse AUM's @ Maximum AML: 1,044

Monitor-No. WHT acres per horse: N/A
Little Fish Lake WHT acres per horse: 3,151
Little Fish Lake HMA acres per horse: 736

Population:

FS Monitor-No. Winter Census (Date Unknown) 0-18
FS Monitor-No. Summer Census (Date Unknown) 11
FS Little Fish Lake WHT Winter Census (Date Unknown) N/A
FS Little Fish Lake WHT Winter Census (Date Unknown) 133-158
BLM Little Fish Lake FY06 Reported: 19
Current population of all 3 wild horse areas: Unknown

The 2002 winter census flight conducted by the BLM and FS determined that there were 117 wild horses within the Monitor WHT. A map was not attached to the census flight report therefore the exact number of wild horses cannot be determined for Monitor (south) or Monitor (north). The inspection report documented that the majority of wild horses were observed in Monitor (south).

Little Fish Lake WHT and Little Fish Lake HMA were
Last Gathered 2/1/06 thru 2/14/06
It is unknown if Monitor-No. WHT was included in this gather.

Planned to Gather: 16
Actually Gathered: 16
Planned to Remove: 16
Actually Removed: 15

Grazing Allotments in WHT: _____ Grazing Allotments in HMA:

Monitor-No. WHT
Monitor Complex C & H
(since this is a complex, have
requested individual allotment
names)

Little Fish Lake WHT
Wagon Johnnie Summer

These WHT's are authorized for summer grazing.

Monitor (South):

Co-Managed with BLM Saulsbury HMA

Monitor (South) Acreage:	N/A acres
Saulsbury HMA Acreage:	135,299 acres (144,267 HA acres)
Combined Acreage:	Unknown

Suitable Monitor-So. Winter Grazing Acres:	71,880 acres
Saulsbury HMA Acres:	135,299 acres
Total Combined Minimum Acreage:	207,179 acres

Monitor-So. WHT AML:	40-70 horses (Based exclusively on winter habitat)
Saulsbury HMA AML:	40 horses (As of 2/06)

Maximum Assigned Wild Horse AUM's for Monitor-So. WHT:	840
Maximum Assigned Wild Horse AUM's for Saulsbury HMA:	480

Combined Wild Horse WHT and HMA Maximum AML:	110 horses
Combined Wild Horse AUM's @ Maximum AML:	1,320

Monitor-So. WHT acres per horse:	N/A
Saulsbury HMA acres per horse:	3,382
Combined WHT and HMA acres per horse:	1,883

(based on winter habitat only)

Population:

FS Monitor-So. Winter Census (Date Unknown)	54-79
FS Monitor-So. Summer Census (Date Unknown)	88
BLM Saulsbury HMA FY06 Reported:	91
Current population of both wild horse areas:	Unknown

The 2002 winter census flight conducted by the BLM and FS determined that there were 117 wild horses within the Monitor WHT. A map was not attached to the census flight report therefore the exact number of wild horses cannot be determined for Monitor (south) or Monitor (north). The inspection report documented that the majority of wild horses were observed in Monitor (south).

Monitor-So WHT- Last Gathered- Unknown
Saulsbury HMA- Last Gathered- 2/97 (As of 2/06)

Grazing Allotments in WHT: _____ Grazing Allotments in HMA:

Little Fish Lake C&H Summer
(requested individual
allotments for this complex)

McKinney C&H Winter
(requested individual (Vacant)
allotments for this complex)

Stone Cabin C&H Summer
(requested individual
allotments for this complex)

Saulsbury Winter C&H Winter
(requested individual
allotments for this complex)

Monitor Complex C&H Summer
(requested individual
allotments for this complex)

Stone Cabin WHT:

Co-Managed with BLM Stone Cabin HMA,
Hot Creek HMA, and Reveille HMA*

(*It is unclear the extent of the Hot Creek and Reveille HMA interaction with the Stone Cabin WHT and Stone Cabin HMA but these HMA's were included in the "metapopulation" of the Stone Cabin area.

The Monitor-So. WHT and Saulsbury HMA were then linked by metapopulation to this Stone Cabin HMA grouping)

Stone Cabin WHT Acreage: 1,460 acres
Stone Cabin HMA Acreage: 407,543 acres
Hot Creek HMA Acreage: 54,657 acres
Reveille HMA Acreage: 105,494 acres
Combined Acreage: 569,154 acres

Suitable Stone Cabin WHT Winter Grazing Acres: 700 acres*

*FS considers acreage too small to support a herd. Land is used as an incidental connection to BLM's Stone Cabin HMA

Stone Cabin WHT AML: 1-2 horses (This is inclusive in BLMs AML)
 Stone Cabin HMA AML: 364 horses (Reported 2/06)
 Hot Creek HMA AML: 41 horses (Reported 2/06)
 Reveille HMA AML: 138 horses (Reported 2/06)

Maximum Assigned Wild Horse AUM's for Stone Cabin WHT: 24
 Maximum Assigned Wild Horse AUM's for Stone Cabin HMA: 4,368
 Maximum Assigned Wild Horse AUM's for Hot Creek HMA: 492
 Maximum Assigned Wild Horse AUM's for Reveille HMA: 1,656

Combined Wild Horse WHT and HMA Maximum AML: 543 horses
 Combined Wild Horse AUM's @ Maximum AML: 6,516

Stone Cabin WHT acres per horse: 730 acres
 Stone Cabin HMA acres per horse: 1,119 acres
 Hot Creek HMA acres per horse: 1,333 acres
 Reveille HMA acres per horse: 764 acres

Average Combined Acres per horse for All Areas: 1,048 acres

Population:

FS Stone Cabin WHT Winter Census (Date Unknown) N/A
 FS Stone Cabin WHT Summer Census (Date Unknown) N/A
 BLM Stone Cabin HMA: (Reported 2/06) 330
 BLM Hot Creek HMA: (Reported 2/06) 3
 BLM Reveille HMA: (Reported 2/06) 116

Total Combined Current Population 449
+ 20% After Spring Foaling Season 89

Current Estimated Metapopulation 538

Stone Cabin HMA Last Reported Gather: 11/98
 Hot Creek HMA Last Reported Gather: 2/06*
 Reveille HMA Last Reported Gather: 11/01

*Hot Creek HMA was not reported in the 2006 Gather Schedule yet is listed as being gathered in the BLM Fiscal Year 2006 Herd Statistics sheet released in August, 2006.

Grazing Allotments in WHT: Grazing Allotments in HMA:

Wagon Johnnie- Summer

Total Acreage of Allotments within HMA's and WHT's boundaries are unknown at this time.

Fish Creek HMA:

This are is NOT being considered for AML adjustments at this time.

However, because it is part of the Fish Creek Complex and many of the rangeland health standards and EA's are done with this HMA included. It was felt that including information about this area would serve for greater understanding in the general management policies of the entire complex.

Fish Creek Acreage:

Herd Area Acreage: 266,193

Herd Management Acreage: 250,331

Fish Creek HMA AML: 107-180* horses

*AML was reduced in 2004 from 235 to 180

Maximum Assigned Wild Horse AUM's for Fish Creek.HMA: 2,160

Fish Creek HMA acres per horse: 1,404

Population:

Fiscal Year 2006 Reported Population: 57*

*reported in February 2006 before foaling season

Gather History:

February 2006: 114 horses removed

July 2005: 886-1,120 horses removed

July 2004: 55 horses removed

August 2000: 600 horses removed

Emergency Gather- Date Unknown-Removal Numbers Unknown

The gather numbers and dates were taken from EA#NV062-EA05-04 Fish Creek Complex Wild Horse Gather 2005. 2006 removal numbers were from the 2006 National Gather Schedule.

Grazing Allotments in HMA:

The Total Acreage of Allotments within the HMA and WHT's boundaries is unknown.

Grazing Allotment	Public Acres*	Private Acres	Total AUM for Allotment	Horse AML	Horse AUM's
Arambel Allotment	47,021	149	1,349	32-54	648
Fish Creek Ranch	289,395	5,740	4,815	45-75	900
Lucky C	113,849	1,373	3,054	25-42	504
Ruby Hill	13,974	2,539	1,286	5-9	108
Totals	464,239	9,801	10,504	107-180	2,160

Total Acreages may be less than acreage total due to exclusion of intermittent water data.

Allotment areas are larger than designated HMA.

Amount of allotment acreage within HMA is unknown.

Did not submit this, but keep as info.

The following Wild Horse Areas were gathered in February 2006.

Fish Creek-	131 Gathered	114 Removed
North Monitor-	30 Gathered	30 Removed
Sevenmile/Butler Basin	84 Gathered	84 Removed
Little Fish Lake	16 Gathered	15 Removed
Outside Fish Creek Complex	58 Gathered	58 Removed
Totals	319 Gathered	- 301 Removed