

Inyo National Forest
Crowley Lake Basin Grazing Allotment Analysis
351 Pacu Lane, Suite 200
Bishop, CA 93514

July 27, 2007

RE: Crowley Lake Basin Grazing Allotment Analysis - File Code 1950/2230

Enclosed are my comments/input regarding the scoping period for the Crowley Lake Basin Grazing Allotment Analysis.

I deeply appreciate the opportunity to participate in the management and stewardship of our Nations resources.

Sincerely,

NAME/ADDRESS REMOVED

While some information is provided in the scoping notice, file code 1950/2230, insufficient information was available regarding the "horse use" listed for some of the allotments. There failed to be a distinction between privately owned horses or wild horses if applicable.

Though the map of the proposal area shows that all lands for the proposal area are in California, several of the allotments listed have names for Wild Horse and Burro Herd Management Areas managed by Nevada Bureau of Land Management Field Offices, most specifically, the Hot Creek Allotment, which is listed in NV Herd Statistics as Hot Creek HMA, managed by BLM but for USFS. Others included Rock Creek, McGee and Antelope and often, USFS Wild Horse Territories run parallel to BLM HMAs.

Though none of this is mentioned within the proposal areas or actions, based on the evidence, wild horses and burros are most likely present in the proposal areas and need to be included with detailed management plans including Animal Unit Months available for wild horses and burros, spring sources and access, acreage being proposed that will exclude them from use, as well as forage allocations being allocated to all big game species in the area (AUMs), which includes

bighorn sheep, mule deer, pronghorn antelope, or elk and their projected population objectives for the term of the proposal.

Antelope Allotment

Please provide a full description of “all classes of livestock”, what “reduce allowable use” actually covers or reduces from and to, what the bitterbrush standard is projected to be around Little Hot Creek Meadow, what, if any impacts are projected to a non use standard for the Tui Chub enclosure at Little Hot Creek, if wild horses and burros are included in the “allow use only after 6/1” to reduce disturbances to sage grouse, and what information do you currently have about sage grouse or sage grouse grazing interactions.

Will the “upgrade” the Antelope Springs troughs include wild horse and burro use and if so, how much?

If any WHT designated from the 1971 WFRHBA is part of the proposal area, please list acreage that overlaps with this allotment.

Hot Creek

It states “authorize grazing for cattle and horses” – what kind of horses, wild? What are the AUMs and population numbers for horses to be managed in the allotment? Currently, BLM is showing that Hot Creek has an AML of 41 but only 3 wild horses actual reside in the Hot Creek area. Is this an accurate number of the remaining population? Please provide the current estimated population if wild or projected use level if not.

Please send me a copy of the 1996 MOU referred to in section i with a summary of the conflicts of heritage resources.

Also, a 10% streambank trampling standard- what studies/documents support this standard? What is the current standard?

Does the allowable use after 6/1 apply to wild horses and burros?

What is the estimated population of the endangered Sierra Nevada bighorn and what are their population objectives and forage allocations (AUMS)? I have seen studies and reports that claim the Sierra Nevada bighorn was improperly classified as a separate sub-species of bighorn. Has any changes been made to its status as a result?

What is the estimated population of mule deer for the area, population objectives, forage allocations (AUMs) and projected use levels? Any other big game species such as pronghorn antelope or elk in the area? If so, please include same information. Is there any projected introductions of big game species to the area? Other wildlife such as the Lahona Cutthroat Trout? Are they currently present? If so, what are the management objectives?

Will any of the proposed water developments effect wild horse and burro access, availability or use? If so, how much and what is being considered for the standard?

How many pastures are in the allotment? How many mile of fencing? How will “each pasture be rested for several years” if wild horses are present? Is fencing interrupting migratory routes or causing increased grazing pressure by wild horses or burros due to free-roaming behavior being inhibited through these pastures?

Based on prior monitoring knowledge, what is the estimated or projected time necessary to rest pastures for bitterbrush recovery?

McGee Allotment

McGee Mountain HMA is listed as an exclusive wild burro use habitat. Though wild horses and burros have been federally defined as “wild animals”, too often public resource agencies attempt to include them as “livestock” classifications. Additionally, the State of California’s Fish & Game Code defines wild burros as a protected wildlife species within California.

If this allotment is closed to all livestock grazing, is it USFS intent to remove federally protected wild burros by the WFRHBA or California protected wild burros from the area?

If wild burros of any classification are present, what is the current estimated population? Also, under BLMs management, the wild burro population and habitat have plummeted over the last 20 years, so much so that wild burros within the State of California, under BLM jurisdiction, are being managed at such unviable and low numbers that state extirpation is expected within the next 10 years.

Though California designated wild burros as a protected wildlife species prior to the implementation of the 1971 WFRHBA, no data is currently available on the state fish and game website as to the estimated remaining population within the state.

If wild burro removals are being proposed, please provide the remaining state population for California not under BLM jurisdiction for comparison purposes to see if state managed populations are also in danger of extirpation.