

Response to Susie Stokke email - 1/31/08

Page 3-48 Section 3.3.11.3 Seasonal Wild Horse Movements

The BLM LVFO WH&B specialist believes that **three largely independent herds exist on the NTTR. One is located in the Kawich Valley...**

Page 4-9 Section 4.4.10 Wild Horse and Burro Management, last paragraph:  
...but the unpredictable free-roaming nature of wild horses does not ensure animals will not **attempt to establish herds (seasonal or permanent) in Kawich Valley which would have to be gathered periodically.**

Additionally, page 4-4 Section 4.4.4 Riparian Resources, paragraph 3, BLM states:  
Keeping the herd at the proposed population size of 300-500 or smaller and **keeping most of the herd in Cactus Flat** (particularly the north and east areas) should reduce grazing pressure at riparian areas located in the Cactus Range, east slope of the Kawich Range, **Kawich Valley ....**

Page 1-2 Figure 1-1 Map of Nevada Wild Horse Range

Page 2-5 Figure 2-1 The Proposed Plan  
Indicates clear changes in management boundaries that are used to determine AML as indicated by the yellow line indicating "core area".

Page 3-47 Figure 3-12 Indicates Major Springs and Reservoirs on the North Range.

Based on the map cited in Figure 1-1 that indicates the boundaries of the NWHR, many of these springs and reservoirs were part of the core management area as identified in figure 1-1. However, the management boundaries that were used to determine AML, as indicated by Figure 2-1, clearly show that a great deal of these historic water sources were no longer included in the new core management area or factored in as available water in AML determinations.

Additionally, page 3-45 Figure 3-11 Ground survey point counts of wild horses in the planning area, 1972 and 1974, provides wild horse distribution counts that indicate heavy populations were noted within the NWHR around these same water sources that were excluded from the new core area (as delineated by figure 2-1) that was used to determine wild horse AML.

The historical presence and use of wild horse herds was also acknowledged by BLM on page 3-46, Section 3.3.11.2 Identification of Wild Horse Herd Areas, last paragraph:  
“...**Wild horses were widespread** from the west slope of the Belted Range **across Kawich Valley** into Cactus and Gold flats>”

All of these factors indicate significant changes were made to management areas that excluded wild horses from both known historical use areas (1972 and 1974) and known critical habitat requirements.

BLM addresses the consequences of removing known critical water sources to animals but NOT to wild horses.

On page 4-9, Section 4.4.9, Livestock Grazing Management, last paragraph in section, BLM states for livestock:

“The springs and riparian areas **are the most important resource**, and could be protected with exclosures. Water could be piped outside the exclosures to ensure animals have adequate water supply, therefore **not needlessly suffering from severe thirst.**”

**For livestock, the removal of THE MOST IMPORTANT RESOURCE, springs and riparian areas, was acknowledged as causing “needless suffering from SEVERE THIRST”**

However, on page 4-14, Section 4.5.2 Unavoidable Adverse Impacts, first paragraph, BLM states: “Fencing spring and riparian areas would have **a direct impact on wild horses** that frequent the areas. Some springs would be closed off and **no water provided for the horses**. There is **direct benefit to fencing the spring area** to improve the quality of the water and riparian habitat.”