

## Range/Grazing

### ***How does the BLM determine if the range has deteriorated – is there sound science involved?***

Yes, the BLM conducts monitoring of public lands for vegetation condition, forage and water availability and wildlife habitat condition. The appropriate management level (AML) for the Paymaster and Montezuma Peak HMAs were established through Final Multiple Use Decisions (FMUDs) issued following completion of Rangeland Health Evaluations, Watershed Assessments and Allotment Evaluations for the Magruder Mountain, Monte Cristo, Montezuma, Yellow Hills and Sheep Mountain Allotments between 1999 and 2007.

These documents involved analysis of all or a combination of monitoring data including utilization, trend, riparian functioning condition ratings, precipitation, wildlife habitat studies, and wild horse and burro inventory data to assess these areas for rangeland health and subsequently adjust AMLs for HMAs within these allotments. Throughout all of these evaluations, a common theme became the inherent lack of suitable habitat for wild horses, reflected by poor forage and water availability. The evaluations resulted in carrying capacity analysis for livestock, wild horses and wild burros within these areas, conservatively identifying allowable use in these arid ecosystems to prevent degradation to the vegetation and riparian resources and maintain healthy animals.



*Paymaster HMA, February 2010.*

It was determined through the analysis of monitoring data and evaluation of Resource Management Plan and Allotment Specific Objectives that some of the Resource Advisory Council Rangeland Health Standards were being met, and some were not. The reasons identified for Standards not being met included drought, wild horse use outside of HMAs, past livestock management, overlap of wild horse and livestock use, lack of habitat for wild horses and stocking levels in certain areas that were too high for the resources. Wild horse

and burro AMLs also were adjusted to ensure that the populations were in balance with the limited resources in the arid region in order to maintain healthy animals and provide improvement to the habitat.

The Proposed Action in the environmental assessment (EA) is consistent with maintaining a thriving natural ecological balance between the wild horse and burro populations, wildlife, livestock and vegetation, and to protect the range from the deterioration associated with an overpopulation of wild horses or burros. For decades, the BLM has hired rangeland management specialists, wildlife biologists, as well as wild horse and burro specialists, whose expertise is used to monitor and assess rangeland conditions on public lands.

***Rather than remove the wild horses and burros, why doesn't the BLM eliminate or reduce livestock grazing?***

Livestock grazing has been reduced within the proposed gather area, and little livestock use occurs within the Paymaster or Montezuma Peak HMAs. Livestock grazing is evaluated for conformance with Standards for Rangeland Health and adjusted through appropriate decisions following coordination with the interested public and completion of Environmental Assessments. All of the allotments that are involved with the Montezuma Peak and Paymaster HMAs have been evaluated in Rangeland Health Evaluations, Watershed Assessments and Allotment Evaluations for the Magruder Mountain, Monte Cristo, Montezuma, Yellow Hills and Sheep Mountain Allotments between 1999 and 2007. Adjustments to the livestock systems were made that included reductions in permitted use on 3 of the 5 allotments, changes to season of use, implementation of rest rotational grazing systems and restrictions for use during the critical growth season. Overall, livestock permitted use within these allotments was reduced by 23 percent. No livestock use is authorized within the Montezuma Allotment portion of the Paymaster or Montezuma Peak HMAs. No livestock use occurs within the Monte Cristo Allotment portion of the Paymaster HMA and negligible use by livestock occurs within the Magruder Allotment portion of the Montezuma Peak HMA. The Yellow Hills and Sheep Mountain Allotments maintain low levels of permitted use, and only portions of the allotments are within the HMAs.

Congress made the decision to manage public lands for multiple use purposes, not just a single use. While passing the 1971 Wild Free Roaming Horse and Burro Act, the conference committee specifically stated that: *“The principal goal of this legislation is to provide for the protection of the animals from man and not the single use management of areas for the benefit of wild free-roaming horses and burros.”*

Congress affirmed its intent for multiple-use when it passed 1976 Federal Land Policy and Management Act, requiring the BLM to manage the public lands for a wide variety of uses (including livestock grazing) under the principles of multiple-use and sustained yield.

Livestock grazing is often seasonal in nature. The ranchers will move their livestock to various areas or completely off the range onto their own private lands. Wild horses and burros stay on the range year round.

Ranchers supplement livestock grazing by hauling water. They may hold water rights to the area, and pump water that is also used by wild horses, wild burros and wildlife. Closing public lands within HMAs to livestock grazing would not be a long term solution, and would not allow the BLM to greatly increase the number of wild horses or burros on the range. At growth rates of 16 percent per year, it wouldn't be long before the BLM needed to remove excess horses.

To maintain healthy wild horse population and prevent range damage, we would be required to remove an even larger number of excess wild horses and burros each year. The Tonopah Field Office has determined that the habitat within the Montezuma Peak HMA is not suitable to wild horses, and is limited within the Paymaster HMAs. Removal of all livestock from these areas would not allow for the increase in use by wild horses due to the lack of habitat.

***Why doesn't the BLM develop supplement the wild horses and burros with food and water?***

Under the 1971 Wild Free Roaming Horses and Burros Act, we are required to manage wild horses and burros at the minimum feasible level of management. These are wild animals. It is not consistent with management at the minimum feasible level to provide supplemental feeds or rely on water developments that require frequent maintenance in order to maintain larger populations of wild horses and burros than the area can naturally support.

However, we do supplement (haul) water during emergency situations, if necessary, and may develop or improve water sources within HMAs to improve distribution of the wild horses and promote resource improvement.

***What data does the BLM use to establish Appropriate Management Levels?***

The BLM determines the appropriate management level of wild horses and burros based on an ongoing program of monitoring over several years involving studies of grazing utilization, trend in range ecological condition, actual use, precipitation (climate), the results of land health assessments, and other factors.

The process generally begins with a management evaluation. Through the evaluation process, resource monitoring data is analyzed and a determination is made as to whether the current management and stocking levels for wild horses and/or burros (or livestock or wildlife) are achieving land health objectives.



*Wild horses located between the Montezuma Peak and Paymaster HMAs outside of HMA boundaries, February 2010.*

If land health objectives are not being met, changes in management or stocking levels are proposed. Results of the BLM's analysis are documented in an environmental assessment (EA), which is provided to interested public for review and comment.

The BLM carefully considers the public's comments before making a final decision. The public also is provided with the opportunity to request administrative review if they disagree with the BLM's final decision.

***How does the BLM determine when a gather to remove excess wild horses or burros is needed?***

The BLM monitors grazing utilization, trend in range condition, actual use, population data, and other factors to determine if excess animals are present and removal is necessary to restore the range to a thriving natural

ecological balance and prevent a deterioration of the range.

***What is a TNEB?***

TNEB means thriving natural ecological balance. The goal of wild horse and burro management is to maintain a thriving natural ecological balance between wild horse and burro populations, wildlife, livestock and vegetation, and to protect the range from the deterioration associated with overpopulation of wild horses and burros.

To achieve a balance, wild horses and burros are managed to assure significant progress is made toward achieving land health standards for upland vegetation and riparian plant communities, watershed function, and habitat quality for animal populations. Wild horse and burro herd health is promoted by achieving and maintaining a thriving ecological balance.

***What are the drought conditions like in this area?***

Drought is a recurrent feature of arid Central Nevada. Drought should not be confused with aridity. Drought has been defined as a period when precipitation is less than 75 percent of the average amount (Society for Range Management 1989) while aridity refers to areas of low rainfall and is a permanent feature of climate. From 1944 to 1984 drought occurred in 17 out of 40 years in the southwestern United States (Holecheck and al. 1995). As of June 8, 2010, the U.S. Drought Monitor reflects “moderate drought” and “abnormally dry” for Esmeralda County, Nevada ([www.drought.unl.edu/dm/monitor.html](http://www.drought.unl.edu/dm/monitor.html)).

The proposed gather area area receives only three to five inches of precipitation in the valley bottoms and 12 inches on the mountain tops. The weather station at the Tonopah Airport shows an average annual precipitation during the period of record (1954-2009) of just 5.08 inches. The Magruder Mountain rain gauge reflects an even lower annual average since 1985 of just 3.51 inches.

A BLM rain gauge is located Magruder Mountain Allotment and precipitation data has been collected at this location since 1985. Annual rainfall has ranged from 1.22 inches in 1991 to the maximum recorded precipitation of 10.26 inches in 1998. The average annual precipitation received since 1985 was 3.51 inches. During 6 of these years, precipitation received met the definition of drought (<75% of average), and during 9 years, the precipitation was considered above normal (>125 percent of average).

Precipitation data collected at the Tonopah Airport from 1985 to 2009 were also analyzed. Annual rainfall at this location has ranged from a minimum of 1.54 inches in 2003 to a maximum of 8.03 inches in 1998. Average precipitation received at this station throughout the



*Key Area 5, Montezuma Peak HMA*

period of record (1954-2009) is 5.08 inches annually. Eight years at this location meets the criteria of a drought year and 6 years are recorded as above average. Drought conditions occurred one year of three on average.

The precipitation data indicates that drought occurs one of every 2-4 years in this area. From review of these figures it is very clear that annual precipitation is extremely limited in this area due to drought and extreme fluctuation of annual and seasonal precipitation. As a result, it is important to manage the resources within the Montezuma Peak and Paymaster HMAs conservatively so as to allow protection of vegetation resources and health of wildlife and wild horses and burros through the poorest of years when drought can result in markedly reduced forage resources and water.

***Is there livestock grazing in this area?***

Yes. Portions of five livestock allotments overlap portions of the Montezuma Peak and Paymaster HMAs. Use by livestock within the HMAs is minimal due to steep terrain and limited forage and water. No livestock use occurs within the Monte Cristo Allotment portion of the Paymaster HMA and negligible use by livestock occurs within the Magruder Allotment portion of the Montezuma Peak HMA. The Yellow Hills and Sheep Mountain Allotments maintain low levels of permitted use, and only portions of the allotments are within the HMAs.

***Is the BLM removing excess wild horses and burros merely to increase livestock grazing use?***

No. The fact is that there has been a 43 percent reduction in authorized livestock use on public lands since 1941. Livestock use within the proposed gather area sustained a 23 percent reduction through decisions issued between 2001 and 2007.

***Does wild horse overpopulation impact wildlife and plants?***

Yes, it can. A wide variety of wildlife species common to the Great Basin and Mojave ecosystems can be found in the Montezuma Peak and Paymaster HMAs. These include coyote, black-tail jackrabbit, desert cottontail, bobcat, and numerous raptors, reptiles, and other small mammals. The area provides habitat for mule deer, and pronghorn on a seasonal or yearlong basis. BLM protects by policy, *special status* plant and animal species. The list includes certain species designated by the state of Nevada, as well as species designated as “sensitive” by the Nevada BLM State Director. As many as fifteen Special status species of bats and birds may utilize the proposed gather area for their habitat. Many species of migratory birds also utilize the area for portions their lives. As part of its multiple-use mission, the BLM is mandated to protect habitat to support these wildlife species.

Wild horses and burros often graze the same area repeatedly throughout the year. Forage plants in those areas receive little rest from grazing pressure. Continuous grazing does not allow plants sufficient time to recover from grazing impacts. Such overgrazing results in reduced plant health, vigor, reproduction, and ultimately to a loss of native forage species from natural plant communities. Over time, this greatly diminishes habitat quality as abundance and long-term production of desired plant communities is compromised. If wild horse and burro populations are not controlled in this area, forage utilization will exceed the capacity of the range.

***Why don't you just make more land available to the wild horses and burros?***

The BLM would need approval from Congress to expand herd areas for wild horses and burros. By law, wild horses and burros can only be managed on areas of public lands where they were known to exist in 1971, at the time of the passage of the Wild Free-Roaming Horse and Burro Act of 1971.