

## WILD HORSE HERD MANAGEMENT AREAS IN BLMS ELY DISTRICT Prior To The New 2008 Resource Management Plan (RMP)

The following information presented for these Herd Management Areas was taken from the Ely Districts Proposed Resource Management Plan/Final Environmental Impact Statement, Table 3.8-2, page 3.8-5.

This Table was the only source of comprehensive information presented in the RMP BLM used as their basis for eliminating almost 1.6 million acres of former wild horse habitat, zeroing out 12 former Herd Management Areas and reducing the allowable management level (AML) under their jurisdiction by an additional 446 wild horses. This reduction follows a previous reduction in “approved” wild horse populations that removed 240 wild horses from authorized use in 2004. <sup>(1)</sup>

The BLM used a rating system based on five essential habitat components; forage, water, space, cover and whether their approved AML for the herds was capable of reproductive and genetic viability.

Little to no information, data or analysis was provided as to the number of water sources, water or forage production rates, carrying capacity, utilization levels, fencing or current livestock authorizations as related to wild horse use in the Herd Management Areas to make their determinations to zero the herds out.

The BLM Ely District only presented an “adequate” or “inadequate” rating without data to support these ratings. They then expanded their authority to remove these areas from future wild horse use using the following explanation;

*“An “inadequate” rating in one or more of the five essential habitat suitability components was considered to render the HMA unsuitable. In several such cases, full evaluations of other components was either not conducted or not considered essential in the management decision.”*

With respect to the Allowable Management Levels (AML), in many instances the BLM Ely District had failed to establish a “range” of AML for each HMA in prior land planning documents but had only established the “high”. BLM determined the concept of establishing a range was necessary to reflect the number of wild horses or burros necessary to remove during round ups to allow for 4 to 5 years of population growth before scheduling removals again based on the already established maximum population level. Therefore, many of the HMAs only report a single number for the maximum allowed wild horse population.

(1) “Establishing of Appropriate Management Levels for Twelve Herd Management Areas” EA# NV-040-03-036.

**Antelope HMA: AML 150-324**

Adequate forage, water, space, cover and reproductive viability.

BLM Recommendation: Adjust boundaries. **Approved.**

BLM approved the recommended boundary adjustment and removed 62,900 acres from the Antelope HMA.

**Applewhite HMA: AML 1**

Forage and cover was cited inadequate with extensive damage to riparian vegetation. Adequate water and space. Reproductive viability was cited as limited due to allotment fencing preventing interaction with other herds.

BLM Recommendation: Remove herd, drop HMA status. **Approved.**

The National Program Office reports wild horse populations have not exceeded 14 wild horses since 2004 but livestock grazing continues to be authorized within the HMA.

**Blue Nose Peak HMA: AML 1**

Forage unsuitable for year-long grazing. Water inadequate. Once water was determined inadequate, BLM no longer analyzed or reported on rating for cover or space. No established herd present; HMA receives incidental use.

BLM Recommendation: Drop HMA status. **Approved.**

In prior land use plans, BLM divided the migratory routes of the Blue Nose Peak and Clover Mountain wild horses into two separate HMAs, despite these areas sharing the same wild horse population. Wild horses traveled to Blue Nose Peak during the winter to escape the winter snows and then migrated back into the Clover Mountains during the summer months.<sup>(1)</sup>

BLM then used separate habitat criteria based on “year-long” suitability to zero out each side of their migration routes as well as using the AMLs BLM established to substantiate a lack of genetically viable populations in the Clover Mountain herd. *Also see Clover Mountains HMA.*

(1) Decision Record/Finding of No Significant Impact for the Ely South Desert Fire Wild Horse Gather, EA#NV-040-06-008, February 2006, pg. 2.

**Buck and Bald HMA: AML 423**

Adequate forage, water, space, cover and reproductive viability.

BLM Recommendation: Combine with Butte and a portion of Cherry Creek. **Approved.**

**Butte HMA: AML 95**

Adequate forage, water, space, cover and reproductive viability.

BLM Recommendation: Combine with Buck and Bald and a portion of Cherry Creek. **Approved.**

**Cherry Creek HMA: AML 0**

Adequate forage, water, space, cover and reproductive viability. No established herd present.

BLM Recommendation: Combine with Butte and Buck and Bald. **Approved.**

The BLM reported in the Ely RMP that all criteria for wild horse management in the Cherry HMA received an adequate rating except a viable population. As a result, they authorized the incorporation of the Cherry Creek HMA with the Butte and Buck and Bald HMA in the creation of a new HMA. Prior land use plans had issued an AML of 0 despite the adequate habitat and BLM has removed all wild horses found within the HMA to conform to the 0 AML; thus, no established herd is present.

**Clover Creek HMA: AML 14**

Forage marginal. Water Adequate. No analysis or reporting on space or cover. Inadequate habitat resources to sustain a genetically viable population of 50 breeding animals.

BLM Recommendation: Remove HMA status. **Approved.**

**Clover Mountains HMA: AML 16**

Inadequate forage, adequate water, marginal space, no analysis on cover. Inadequate habitat resources to sustain a genetically viable population of 50 breeding animals.

BLM Recommendation: Remove herd, Drop HMA status. **Approved.**

**Deer Lodge Canyon HMA: AML 50**

No analysis or reporting on available forage, water, space or reproductive viability. Cover was cited as poor winter habitat; horses move to Wilson Creek and other areas to winter.

BLM Recommendation: Combine with Wilson Creek. **Approved.**

**Delamar Mountains HMA: AML 51-85**

Adequate water, space, cover and forage but heavy to severe use is occurring near water sources and riparian areas. BLM cited the reproductive viability of the AML they issued as marginal and unable to sustain adequate herd size.

BLM Recommendation: Remove herd; drop HMA status. **Approved.**

**Diamond Hills South HMA: AML 22**

Adequate forage, water, cover, space, and reproductive viability.

BLM Recommendation: Retain; this is part of a metapopulation with Elko and Battle Mountain Districts. **Approved.**

**Dry Lake HMA: AML 94**

Adequate forage, water, space, cover, and reproductive viability.

BLM Recommendation: Combine with a portion of Rattlesnake and Highland Peak. **Approved.**

**Highland Peak HMA: AML 33**

BLM cited inadequate winter habitat under their analysis for cover and stated horses in the northern portion of HMA winter in the Dry Lake HMA. Water available primarily in northern part of HMA. As a result, of the inadequate cover rating, no analysis or reporting of forage, space or reproductive viability was done.

BLM Recommendation: Combine with Dry Lake and a portion of Rattlesnake. **Approved.**

While BLM cited inadequate winter habitat, heavy livestock grazing in the winter months in and around the Highland Peak HMA continues to be authorized. In December 2006, 64 wild horses were removed shortly a 1,000 sheep were trucked in less than two weeks after the removals.<sup>(1)</sup> Less than a month before BLM publicly released their final decision to reduce the Highland Peak HMA by two-thirds, an emergency gather was scheduled and 70 additional wild horses were removed with three fatalities.<sup>(2)</sup>

(1) American Wild Horse Preservation Campaign, Winter 2007 News Brief

(2) Caliente Complex Post-Gather Report, September 2008.

**Jakes Wash HMA: AML 21**

Inadequate forage, water, summer range or winter cover.

BLM Recommendation: Remove herd; Drop HMA status. **Approved.**

Despite citing all habitat requirements are inadequate for continued management of wild horse herds, BLM reported removing 49 in July 2004, reported an additional 127 wild horses were found in the HMA via aerial census in May 2007. BLMs Preliminary Gather EA stated they planned to release less than 20 wild horses comprised mostly of older studs and very old mares.<sup>(1)</sup> In July 2007, BLM gathered 97 wild horses and removed them all.<sup>(2)</sup>

(1) Jakes Wash Herd Management Area Wild Horse Gather Plan and Preliminary EA #NV-040-07-EA-045, pg. 2 and 7.

(2) BLM Post-Gather Report, August 2007.

**Little Mountain HMA: AML 15**

Inadequate water and space was cited while the habitat component of cover reported inadequate summer habitat. BLM stated wild horses moved to the Miller Flat HMA in the summer. Due to inadequate rating of water and space, no analysis or reporting of forage or reproductive viability was provided.

BLM Recommendation: Remove herd; Drop HMA status. **Approved.**

Wild horse herds have summer and winter migratory routes between the Little Mountain and Miller Flat HMA. Despite acknowledging this, BLM used the lack of suitable year-round habitat in each HMA to issue an “inadequate” rating for both and recommend zeroing out the herds and dropping each of their HMA status. *Also see Miller Flat HMA.*

Less than a month before BLM publicly released their final decision to zero out the Miller Flat and Little Mountain wild horse herds, an emergency gather was scheduled and 36 wild horses were removed with one fatality. BLM reported one stallion was euthanized due to a non-gather related pre-existing condition; specifically, a broken back.

**Meadow Valley Mountains HMA: AML 0**

No analysis or reporting of forage or reproductive viability. Inadequate water, space and cover cited as marginal. Wild horse use conflicts with desert tortoise habitat.

BLM Recommendation: Remove herd; drop HMA status. **Approved.**

**Miller Flat HMA: AML 15**

Inadequate forage, water, and space. Inadequate cover. Poor winter habitat; horses move to Little Mountain HMA to winter. No analysis or reporting on reproductive viability.

BLM Recommendation: Remove herd; drop HMA status. **Approved.**

Wild horse herds have summer and winter migratory routes between the Little Mountain and Miller Flat HMA. Despite acknowledging this, BLM used the lack of suitable year-round habitat in each HMA to issue an “inadequate” rating for both and recommend zeroing out the herds and dropping each their HMA status. *Also see Little Mountain HMA.*

**Monte Cristo HMA: AML 236**

Adequate forage, water, space, cover and reproductive viability.

BLM Recommendation: Combine with Sand Springs East. **Approved.**

**Moriah HMA: AML 29**

Adequate forage. Inadequate water and space. Lacks suitable year-long habitat; horses move outside the HMA. No analysis or reporting on reproductive viability.

BLM Recommendation: Remove herd; Drop HMA status. **Approved.**

Despite citing all habitat requirements are inadequate to support wild horse herds at any population level, BLM reported wild horses numbered approximately 230 prior to removing 210 in July 2004.<sup>(1)</sup> BLMs Preliminary Gather EA stated they planned to release less than 20 wild horses comprised mostly of older studs and very old mares. An additional 68 wild horses were removed in September 2007. <sup>(2)</sup>

(1) Moriah Herd Management Plan Wild Horse Gather Preliminary Environmental Assessment #NV-040-07-EA-44, May 2007, pg. 2 and 6. (2) Moriah Post-Gather Report. September 2007.

**Rattlesnake HMA: AML 1**

Inadequate summer habitat. Horses move to Dry Lake HMA for summer habitat. No analysis or reporting on forage, water, space or reproductive viability.

BLM Recommendation: Combine a portion with Dry Lake and Highland Peak. **Approved.**

**Sand Springs East HMA: AML 257**

Adequate forage, water, space, cover and reproductive viability.

BLM Recommendation: Combine with Monte Cristo. **Approved.**

**Seaman HMA: AML 159**

No analysis or reporting on forage or genetic viability. Marginal water; very little water on public lands. Adequate space. No summer habitat; cover inadequate.

BLM Recommendation: Remove herd; Drop HMA status. **Approved.**

**White River HMA: AML 90**

No analysis or reporting on forage or reproductive viability. Marginal water; very little water on public lands. Adequate space and cover.

BLM Recommendation: Remove herd; drop herd management status. **Approved.**

**Wilson Creek HMA: AML 160**

Adequate forage, water, cover, space and reproductive viability.

BLM Recommendation: Combine with Deer Lodge Canyon. **Approved.**