

# Response to Staff Recommendation



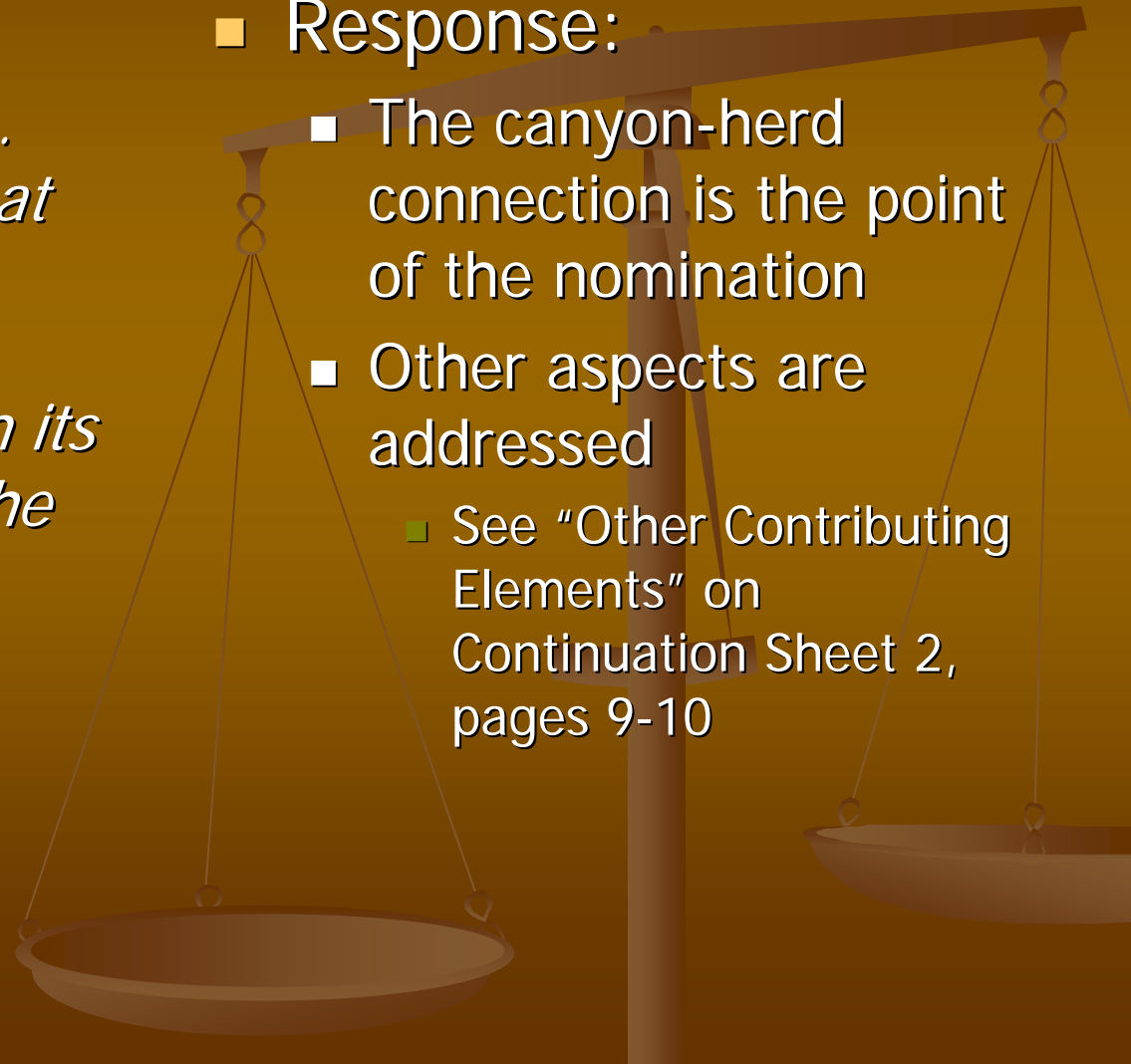
# Focus of the nomination

## ■ Allegation:

- *This nomination ... does not argue that Coyote Canyon is significant in any respect other than its association with the horses.*

## ■ Response:

- The canyon-herd connection is the point of the nomination
- Other aspects are addressed
  - See “Other Contributing Elements” on Continuation Sheet 2, pages 9-10



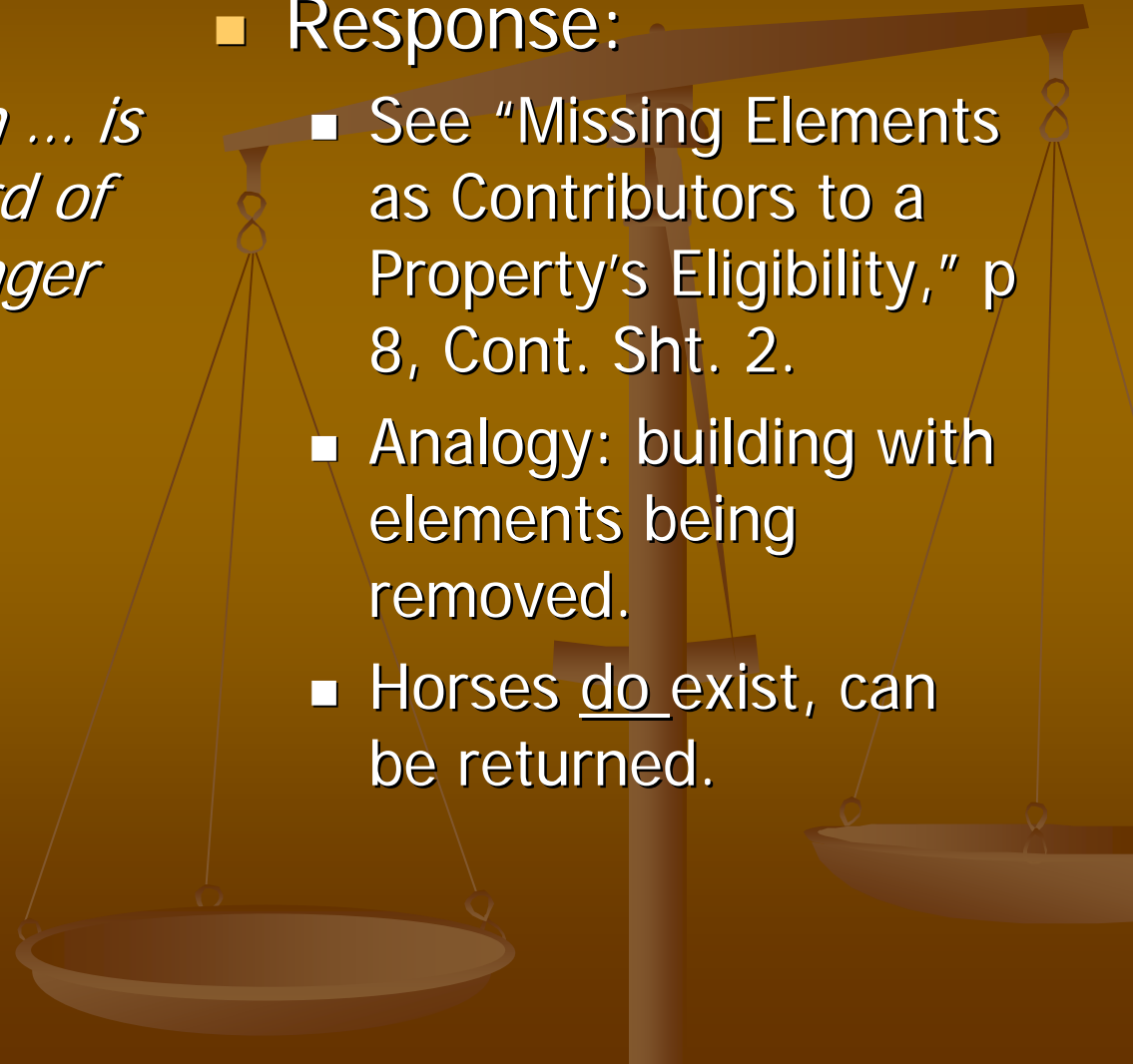
# Horses Aren't There

## ■ Allegation:

- *The ... nomination ... is built around a herd of horses that no longer exists.*

## ■ Response:

- See "Missing Elements as Contributors to a Property's Eligibility," p 8, Cont. Sht. 2.
- Analogy: building with elements being removed.
- Horses do exist, can be returned.



# Lusignan Critique

- Disliked focus on horses, wanted expanded discussion of significance on other grounds
- SHPO suggested focus on traditional cultural qualities
- Focus on horses further explained
- Significance discussion expanded
- Traditional cultural qualities emphasized



# Didn't Analyze Per Criteria

- Allegation:

- *Failure to analyze the property under applicable criteria would appear to be a fatal flaw for this nomination.*

- Response:

- "...meets National Register Criterion "a" for its associations with the traditions, traditional culture, and traditional values of the equestrian American West ..."

p. 9, Cont. Sht. 2

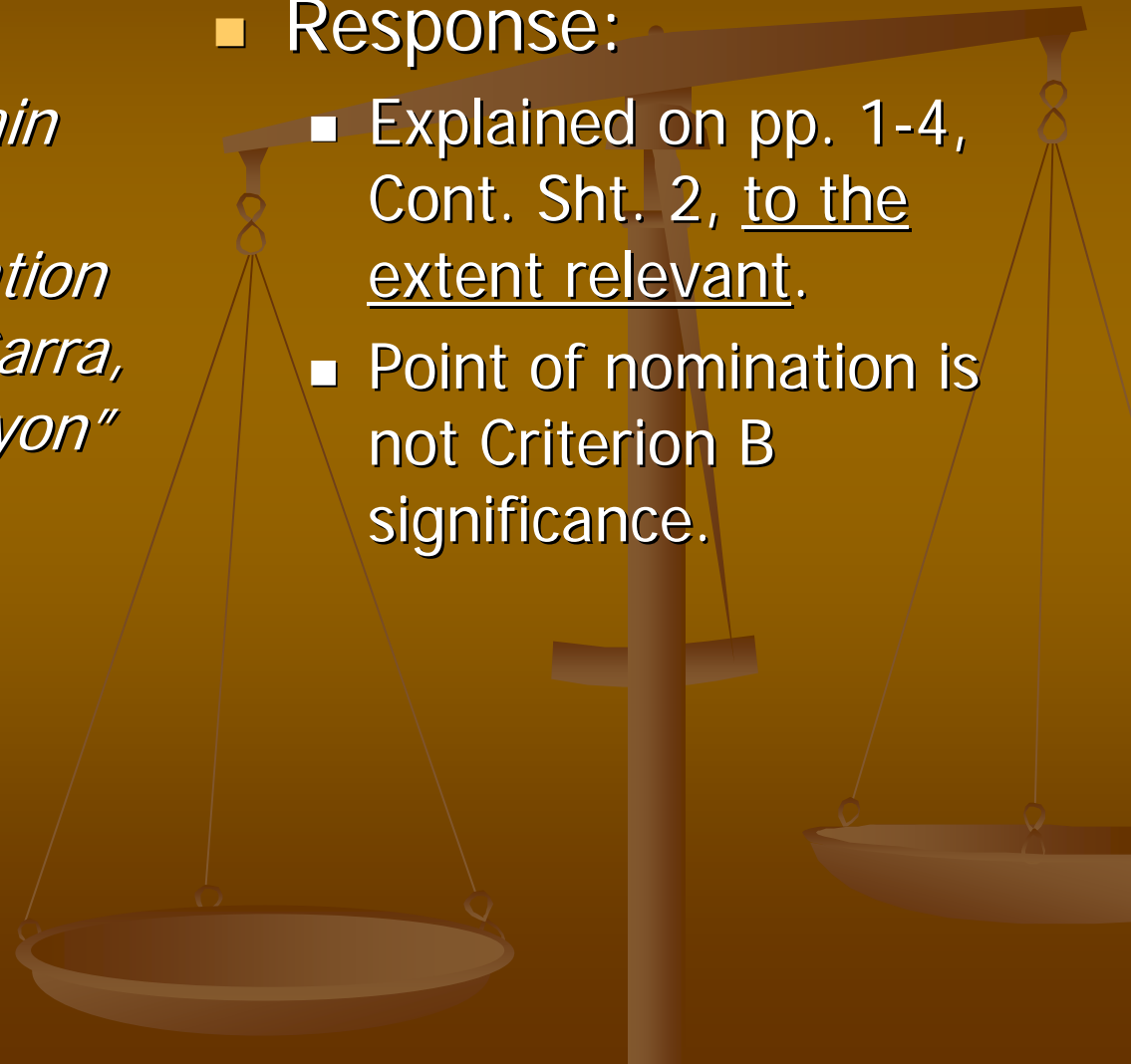
# Application of Criterion B

## ■ Allegation:

- *"no effort to explain why there is a significant association between (Anza, Garra, etc.) and this canyon"*

## ■ Response:

- Explained on pp. 1-4, Cont. Sht. 2, to the extent relevant.
- Point of nomination is not Criterion B significance.



# Application of Criteria A & D

- Allegation:

- *"only two definitive statements of significance."*

- Response:

- How many do you want?
- "If I had more time, I would have written less."

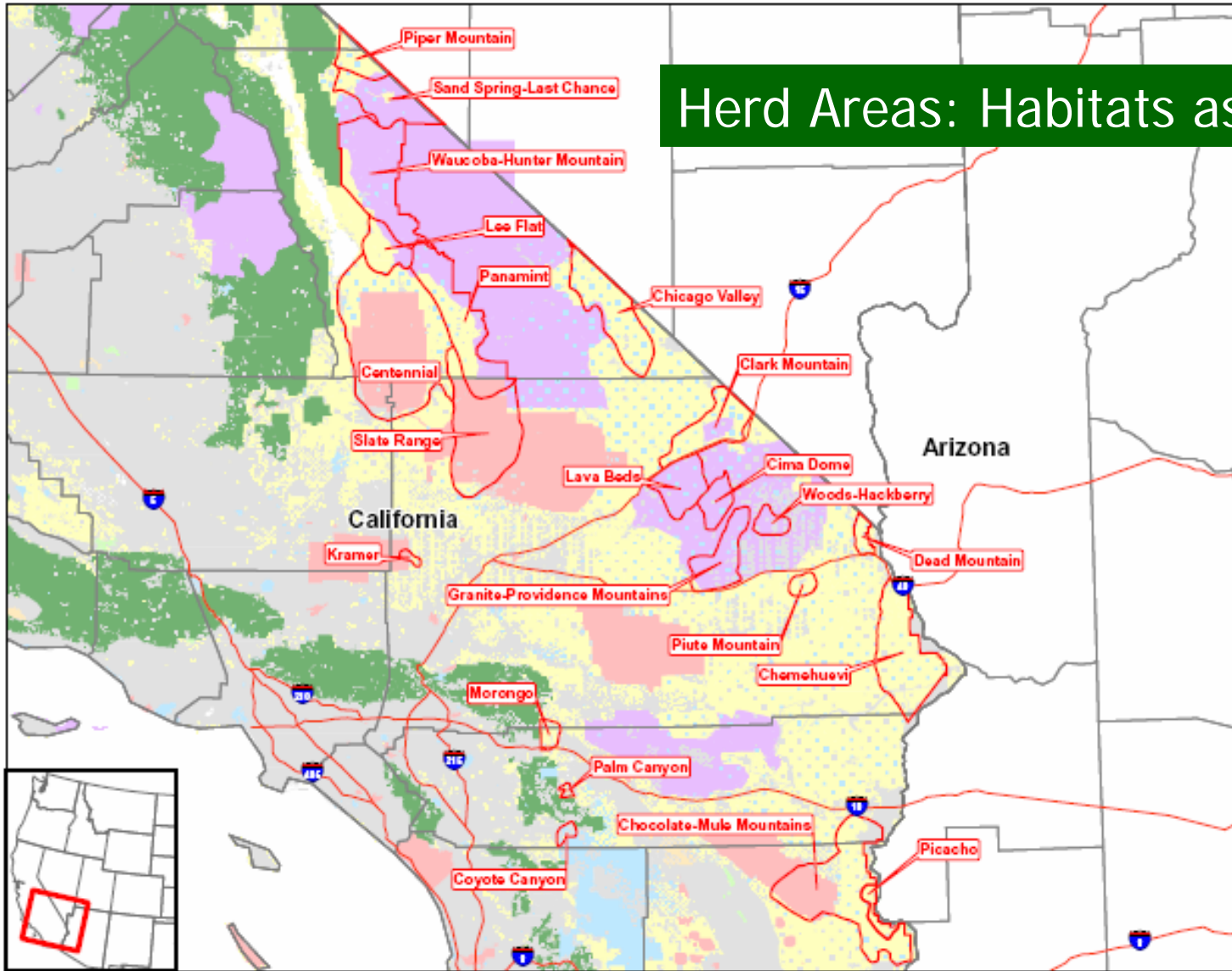
Mark Twain



# Not The Last Herd



# Herd Areas: Habitats as of 1970s



Herd Areas.

October, 2005 and may occasionally be updated as needed. BLM Field Offices are responsible for the determination of herd area and herd management area boundaries. Users of this data may contact the appropriate administrative Field Office to determine if the map data is current.

- Interstate Highway
- Herd Area
- County Boundaries
- State Boundaries
- Ownership**
- BLM
- Reclamation
- Military
- National Park Service
- State
- US Fish and Wildlife
- US Forest Service
- Unclassified



Jan. 17, 2006

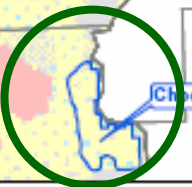
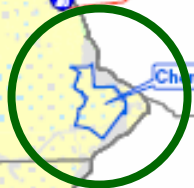
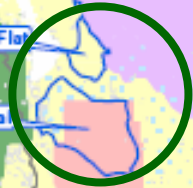
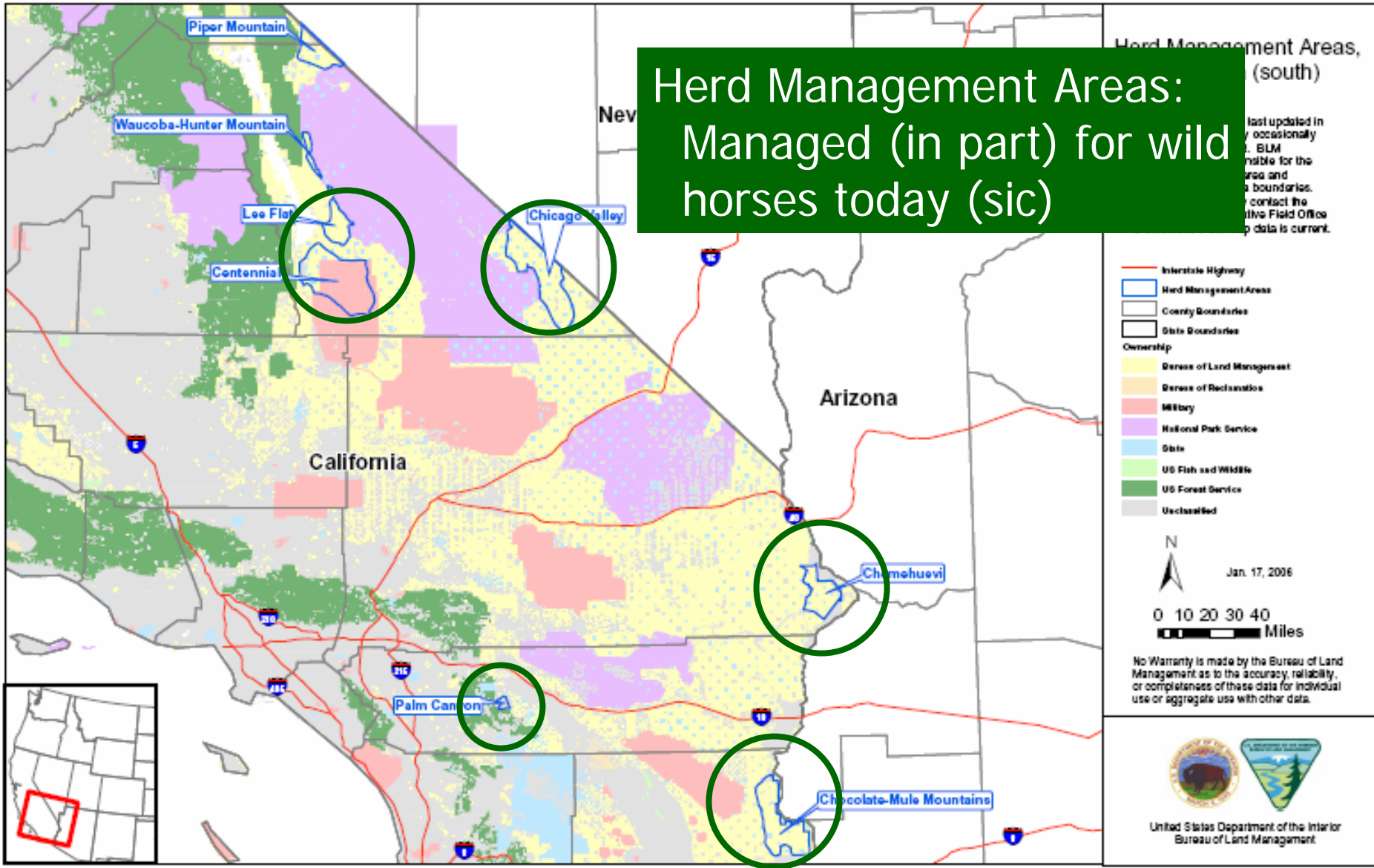
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Bureau of Land Management

Herd Management Areas:  
 Managed (in part) for wild  
 horses today (sic)



## HERD MANAGEMENT AREAS (HMAs) - AREAS MANAGED FOR WILD HORSES AND BURROS

HERD AREA NAME	Herd Code	HERD AREA		HERD MANAGEMENT AREA		Acres Transferred from BLM	Horse AML (1,2)	Estimated Horse Pop	Burro AML (1,2)	Estimated Burro Pop	Last Gather Mo/Year	Year Reach AML
		BLM Acres	Other Acres	BLM Acres	Other Acres							
BITNER	CA0267	47,526	2,907	47,526	2,907	0	25	71	0	0	Oct-93	2003
BUCKHORN	CA0262	67,234	8,892	67,234	8,892	0	85	239	0	0	Nov-03	2004
CARTER RESERVOIR	CA0269	21,062	1,872	21,062	1,872	0	35	95	0	0	Aug-03	2004
CENTENNIAL	CA0654	358,574	671,783	71,353	247,147	6,987	168	265	0	125	Dec-05	2006
CHEMEHUEVI	CA0698	377,671	31,522	105,253	8,228	0	0	0	108	150	May-03	2004
CHICAGO VALLEY	CA0681	311,718	21,310	258,409	19,189	17,591	12	6	0	0	Sep-05	2005
CHOCOLATE-MULE MOUNTAINS	CA0671	340,947	254,909	150,757	8,404	0	0	0	121	90	Dec-03	2005
COPPERSMITH	CA0261	60,114	13,216	60,114	13,216	0	75	65	0	0	Jul-05	2005
FORT SAGE	CA0241	13,649	2,257	13,649	2,257	0	65	50	0	0	Sep-88	2001
FOX HOG	CA0263	92,223	4,577	92,223	4,577	0	220	120	0	0	Aug-05	2005
HIGH ROCK	CA0264	138,510	527	94,606	94	0	120	402	0	0	Sep-01	2004
LEE FLAT**	CA0652	133,360	2,149	71,940	1,308	47,161	0	0	15	0	Oct-01	2002
MASSACRE LAKES	CA0268	63,077	2,581	35,872	1,478	0	20	109	0	0	Oct-88	2004
NEW RAVENDALE	CA0243	23,451	8,731	9,348	5,548	0	25	28	0	0	Jul-04	2004
NUT MOUNTAIN	CA0266	38,327	1,793	38,327	1,793	0	55	149	0	0	Oct-00	2004
PALM CANYON	CA0662	2,758	6,773	2,758	6,773	0	6	0	0	0	Aug-02	2002
PIPER MOUNTAIN	CA0656	95,937	8,397	87,876	8,312	7,742	17	0	82	0	Apr-94	
RED ROCK LAKES	CA0251	13,464	5,146	13,464	5,146	0	25	89	0	0	Sep-03	2004
TWIN PEAKS	CA0242	636,231	121,841	636,231	121,841	0	758	1,398	116	86	Jul-04	2003
WALL CANYON	CA0265	38,909	2,243	38,909	2,243	0	25	68	0	0	Nov-01	2004
WAUCOBA-HUNTER MOUNTAIN**	CA0651	464,307	5,932	22,042	537	424,868	0	0	11	11	Oct-01	2004
ROUND MOUNTAIN (Devils Garden Plateau)*	CA0252	7,637	93	7,637	93	0	10	12	0	0	Aug-04	2005
		3,346,686	1,179,451	1,946,590	471,855	504,349	1,746	3,166	453	462		

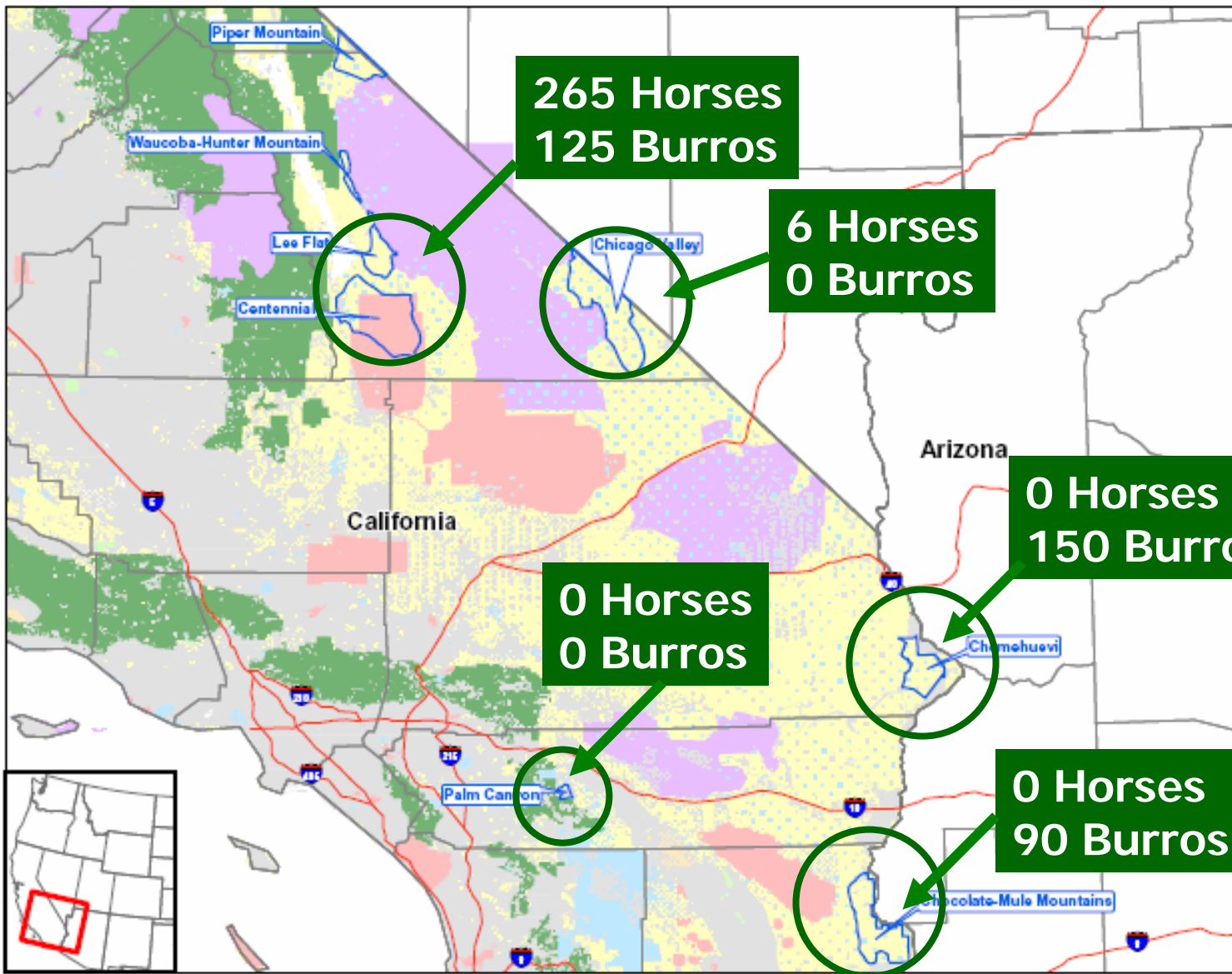
1. Appropriate Management Levels, indicates estimated AML.

2. AML is reported as the maxium number of animals sustainable on a yearlong basis.

## HERD AREAS (HAs) - AREAS NOT MANAGED FOR WILD HORSES AND BURROS

TOTAL HERD AREA NAME	Herd Code	HERD AREA		Acres Transferred from BLM	Estimated Horse Pop	Estimated Burro Pop	Last Gather Mo/Year
		BLM Acres	Other Acres				
CIMA DOME	CA0695	90,429	2,772	93,201	0	0	Dec-92
CLARK MOUNTAIN	CA0691	217,231	16,139	37,376	0	100	Nov-04
COYOTE CANYON	CA0663	285	21,135	0	0	0	
DEAD MOUNTAIN	CA0697	38,580	4,178	0	0	26	Apr-82
GRANITE-PROVIDENCE							

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BITNER	CA0267	47,526	2,907	47,526	2,907	0	25	71	0	0
BUCKHORN	CA0262	67,234	8,892	67,234	8,892	0	85	239	0	0
CARTER RESERVOIR	CA0269	21,062	1,872	21,062	1,872	0	35	95	0	0
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CHICAGO VALLEY	CA0681	311,718	21,310	258,409	19,189	17,591	12	6	0	0
CHOCOLATE-MULE MOUNTAINS	CA0671	340,947	254,909	150,757	8,404	0	0	0	1	90
COPPERSMITH	CA0261	60,114	13,216	60,114	13,216	0	75	65	0	0
FORT SAGE	CA0241	13,649	2,257	13,649	2,257	0	65	50	0	0
FOX HOG	CA0263	92,223	4,577	92,223	4,577	0	220	120	0	0
HIGH ROCK	CA0264	138,510	527	94,606	94	0	120	402	0	0
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MASSACRE LAKES	CA0268	63,077	2,581	35,872	1,478	0	20	109	0	0
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**265 Horses  
125 Burros**

**6 Horses  
0 Burros**

**0 Horses  
150 Burros**

**0 Horses  
0 Burros**

**0 Horses  
90 Burros**

**Herd Management Areas,  
California (south)**

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