

-HIGH ROCK HMA-

1. What is the current estimated population of horses outside the HMA being considered for gather?
2. What is the estimated total of all horses gathered and removed from both the HMA and outside the HMA?
3. The EA states that the High Rock HMA has historically had a reproduction rate of 16-20%. According to the Fiscal Year 2005 BLM reported herd populations estimated at 308, before foaling season. Adjusting this with a 20% reproductive rate would bring the estimated herd population to 370. Yet in Fiscal Year 2006 BLM reported herd population estimates at 402 before foaling season. This is a 30% reproduction rate. Please explain the reasons for this increased reproduction rate.
4. Please explain if this gather is the initiation of the following proposal published in EA # CA-370-06-02, (released on June 2006);
"Reducing the Appropriate Management Levels or eliminating wild horses in the High Rock and Warm Springs Canyon Herd Management Area. This action would reduce or eliminate the *potential* impact that they are having on existing water sources and the bighorn sheep population".
Please explain how the proposed elimination of horses within their lawfully designated herd areas is in compliance with Public Law 92-195, Section 1332-C which states-
"is ***devoted principally*** but not necessarily exclusively to ***their welfare*** with the multiple-use concept for the public lands" and,
Section 1331 "...and to accomplish this they ***are to be considered*** in the area ***where presently found, as an integral part of the natural system of the public lands***".
Also, please explain how this proposal to eliminate wild horses within their lawfully protected herd areas is in compliance with multiple use.
4. Please include the number of documented water sites within this HMA.
5. How many water sources are there within the livestock grazing areas of the HMA?
6. How many water sources are located outside the livestock grazing areas of this HMA?
7. How many water sources do horses and livestock share?
8. Section 3.3 states- "availability of water sources has been determined to be one of the key limiting factors for wild horses in the HMA". Yet Section 3.0 states that "the canyons are relatively well-watered". Please explain this discrepancy.
9. Please describe the projected impacts to wild horses from proposed water developments being implemented within the HMA and water sources affecting the HMA?
10. How many acres of horse habitat are expected to be affected due to the implementation of said water developments"?
11. Were the proposed water developments a factor in the recently established low AML numbers assigned to the wild horses?
12. Will the proposed water developments exclude horses from any water sources they currently have access too? If so, how many? Will they exclude cattle? livestock?

13. In 1989, the National Department of Wildlife transferred non-native Bighorn sheep to the High Rock Herd Management Area, eighteen years after this lawfully protected herd area was established. Bighorn population projections are being encouraged to exceed over 400 head within 10 years while recently lowered horse AML has been set at 120. Please explain how this is in compliance with Public Law 92-195 which states- "is *devoted principally* but not necessarily exclusively to *their welfare* with the multiple-use concept for the public lands"
14. How would the BLM and NDW describe the reproduction rate of non-native bighorn sheep within this HMA and surrounding area since the implementation of this program?
15. Please explain BLM's allowance and justification for introducing non-native species bighorn sheep into a previously established Wild Horse & Burro sanctuary thereby disturbing the previously thriving ecological balance within the Herd Management Area?
16. How many acres of the Massacre Mountain Allotment overlap within the HMA?
17. Provide, for purposes of comparison, animal unit months (AUM) and/or formula BLM has allotted to horses within the HMA. For example, 1 AUM per horse x 12.
18. How many cattle AUM is allotted within the HMA area? How many head of cattle does that equate to?
19. How many acres had BLM removed from livestock grazing as submitted in section 3.9 of this EA, citing long-term rest was necessary for rangeland regeneration? Please explain how rangeland was allowed to deteriorate to such conditions by livestock within the horses protected herd area.
20. How long ago was this rangeland removed from livestock grazing access? How long has it been resting? What is its current state of health?
21. Section 3.9 states- "The majority of cattle graze outside the HMA". Yet greater competition between horses and cattle is also cited within the assessment as justification for removals. Please explain this discrepancy.
22. Is there any other wildlife species that, in BLM assessments, are creating deteriorating range conditions within the wild horse HMA? If so, which species, where, and how much acreage is involved?
23. Please summarize and provide verifiable references for said summary of bovine impact on Greater sage-grouse and its habitat. Please provide the same for equine impact and explain significant differences noted between them.
24. What were the test parameters and/or options utilized as the basis by BLM for population modeling on WinEquis 1.4?
25. What is the estimated cost of fertility treatments for the twenty-eight mares, including follow-up?
26. What is the estimated cost of this gather?
27. Who is BLM contracting for round up services and what is the estimated fee?
28. What was the ratio of those for the gather and those against?

