

8-5-94

August 3, 1994

Mr. Michael Zulinski
Paradise-Denio Resource Area
Bureau of Land Management
705 East 4th Street
Winnemucca, Nevada 89445

Subject: **Snowstorm Mountain Herd Removal Plan and EA**

Dear Mr. Zulinski:

Thank you for consulting the Nevada Commission for the Preservation of Wild Horses. Issues concerning the establishment of a carrying capacity, allocation of forage and an appropriate management level for the Snowstorm Mountain Herd were addressed in correspondence for the Bullhead Allotment Evaluation and Proposed Decision.

Comments of the Snowstorm Mountain HMA Removal Plan

Page 1, Introduction

A proposed multiple use decision for Bullhead Allotment was issued May 19, 1994. We were not advised if this proposed decision was appealed by the affected interests. Therefore, the removal plan cannot validate the appropriate management level until a final decision has been issued.

Page 2, NEPA Compliance

The allotment evaluation is not an environmental assessment.

We appreciate an environmental assessment that addresses "selective removal" or herd re-structuring. Implementation of the Strategic Plan will require NEPA compliance.

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We do not recall the Plan Conformance Record for the 1994 allotment evaluation/decision. Actions proposed for selective removal are not addressed in the land use plan.

Page 3, Population and Removal Data

Please define all data to be collected that address longevity, fertility and movement patterns for this gather. It is important to set criteria for horses returned or released back to the HMA. If the horses gathered are not living to 14 years and older mares (nine years and older) do not have foals, then criteria should be set to release appropriate composition of animals to maintain a herd. This criteria should be set in the environmental assessment.

Page 8, Selective removal

Criteria should be set in the environmental assessment and decision.

Appendix 1. Population estimate

Please indicated the data that supports 90% overwinter survival. Production measured after the foaling season and survival data after the winter should be presented.

Comments for Environmental Assessment

Alternative III presents the best criteria to assure reproduction and survival of the re-structured Snowstorm Mountain Herd. The Proposed Action to selectively removal of all horse 5 years of age and younger with the release of all horses nine years of age and older from outside the HMA propose a significant re-structuring of the herd. The environmental assessment does not adequately evaluate the impacts to genetic diversity, longevity or productivity to the herd from the proposed action.

Given the information of these two documents, it appears reasonable that a criteria for horses released into this herd area can be determined. Depending upon the composition of horse gathered, the release criteria could be the following:

- * Sex ratio 55:45 males to females.
- * 10% of mares below nine years of age
- * Color composition proportional to gather

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Since the age, number, longevity and productivity of this herd is not known, the gather data will provide the District the necessary information to implement a criteria to assure herd viability.

We encourage the District to better apply all available data to make the correct decision for the welfare of the Snowstorm Mountain Herd. Implementation of broad policies for the adoption program cannot substitute for the regulatory mandates to protect this herd.

We assume that if full force and affect status has be determined for the horse decision, that the same criteria will be applied to livestock and wildlife decisions.

Please consider our concerns.

Sincerely,

Catherine Barcomb
Director