

Black Rock Range
East

m 10-2-03

October 2, 2003

Rodger Bryan
BLM-Winnemucca Field Office
5100 East Winnemucca Blvd.
Winnemucca, NV 89445

RE: Black Rock Ranges, Warm Springs Canyon, and Calico Mtn's HMA's

Dear Rodger,

The Wild Horse Commission has reviewed the request for scoping information for wild horse gathers in the Black Rock Range, Warm Springs Canyon and Calico Mountain Herd Management Areas. The Commission has a long history of issues concerning the appropriate management levels for these herd areas.

Recently, the Commission was sent documents on Soldier Meadows that completely ignored a Consent Order mandating how the habitats would be managed. Your Renewable Chief assured us agency that future decisions would take full consideration of previous Consent Orders that settle the disputes of multiple use decisions affecting these herd areas. 8+ years of lost monitoring that was required.

The Calico HMA is divided by the Leadville and Soldier Meadows Allotments. The AML for the Calico Wild Horse Herd was determined in final multiple use decisions in 1994. The carrying capacity was allocated to wild horses in these decisions 9 years ago. The Sonoma-Gerlach Final EIS and MFP III decisions (land use plan) required rangeland monitoring and allotment specific decisions on 3 and 5 year frequencies. Where is the data to support the Calico HMA AML in the pending gather plan?

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The Soldier Meadows Activity Plan EA in 1997 claimed that the Calico wild horse herd had to achieve the 1994 AML to protect desert dace habitat in the West Black Rock HMA. No studies on wild horse impacts were conducted to justify the proposed action. What data collected since 1994 supports the proposed gather to the outdated 1994 AML for the Calico herd?

The Soldier Meadows/Paiute Meadows AE and EA in 2000 included data collected up to 1999. No new or specific data to wild horse impacts were collected. These documents did not assess any rangeland monitoring data on the Leadville Allotment. How can the proposed gather support adjustments in wild horse numbers without a Leadville AE and EA?

The Calico herd was gathered and population dynamics were altered by selective removal criteria to meet the adoption program objectives in a previous gather.

Population data was collected in past gathers to determine the genetic and population dynamic character of this herd. How will this data be presented to predict the present population and impacts of the proposed gather?

The Calico herd was determined to be a part of a complex of Buffalo Hills and East Black Rock herds. Given the complexities of these herds, how will the unique character of the Calico herd be described and maintained in the post-gather population?

It is uncertain when the last population census was conducted on the Calico herd and how the 1997 population estimate was determined. The recruitment rates applied to population estimates are not supported by herd specific data collected by BLM. Assuming that the proposed gather plan requires an EA, how does the Field Office meet NEPA requirements with no new data or data that is 10 years old?

Throughout many Field Offices, the Bureau has applied Fertility Control by the use of an immunocontraceptive vaccine. While the BLM has applied these measures, what herd and what data supports the predicted outcome of these efforts?

The proposed gather to a 1994 AML does not appear to have supportive data to assure a viable Calico herd. How can the proposed EA comply with NEPA without supportive data? How can the proposed reduction in wild horses by 40% below the 1994 AML be supported without any data in the EA?

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Appropriate management levels were determined in multiple use decisions over 10 years ago. The current numbers are obsolete and specific Management Framework Plan Decisions require new decisions at three to five year frequencies. Previous carrying capacities were determined by weight averaging the use pattern mapping data in a manner that dissolved the impacts of overuse of the riparian habitats. Since the time of the multiple use decisions, the 1996 Range Reform Regulations require more immediate attention to resolve the conflicts on these riparian areas.

The Wild Horse and Burro Act requires viable wild horse herds be managed within their HMA's to meet a natural thriving ecological balance. The Sonoma-Gerlach land use plan obligated the Field Office to proper monitoring of rangeland conditions, wild horse populations and livestock permitted use. The previous allotment specific decisions and EA's suggest that none of these monitoring requirements have been fully met and lend very little support to the proposed actions affecting the Calico herd.

Lack of funding for monitoring and data collection have put serious doubts in place as to the accuracy of this proposed action, especially in light of basing decisions on old AML's and data. On the recent Blue Wing gather, the District was only half way through the gather and cannot find any more horses or burros in their HMA and now does not have the funding to fly to determine if any horses and burros are left.

Please consider our comments and concerns in your planning. We would appreciate a written response to our above questions if they will not be included in the draft gather plan.

Sincerely,

CATHERINE BARCOMB
Administrator