

9-12-94

September 12, 1994

Mr. Robert Neary
Winnemucca District
Bureau of Land Management
705 East 4th Street
Winnemucca, Nevada 89445

Subject: Jackson Herd Removal Plan/EA

Dear Mr. Neary:

The Commission for the Preservation of Wild Horses continues to be concerned with the removal and re-structuring of the Jackson Mountain Herd. Our concerns for the establishment of the appropriate management level were expressed in protests and letters for the allotment evaluation and multiple use decision. We have specific comments to the environmental assessment:

Given the amount of data analyzed by the Bureau, the Commission recommended the District adopt Alternative III to assure the herd's viability to recruit itself. The environmental assessment's "Indirect Impacts affecting Wild Horses" best describes the issue of the Commission regarding re-structuring this herd. The District claims there are data that show that the removal of younger age classes has resulted in herds that have shown reproductive rates of 10 to 30 percent. These data should be disclosed in this environmental assessment.

The Winnemucca District has re-structured the East Black Rock Wild Horse Herd twice in the past five years. Age, sex and reproductive data were never assessed in either gather. It would appear that the District has an abundance of meaningful data to fully address the concern of the Commission and yet these data are not provided.

To avoid any further confusion on this issue, we suggest that data be presented to the Commission.

Sincerely,

CATHERINE BARCOMB
DIRECTOR