



DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES
COMMISSION FOR THE
PRESERVATION OF WILD HORSES
123 W. Nye Lane, Room 230
Carson City, Nevada 89706-0818
Phone (775) 687-1400 • Fax (775) 687-6122

September 20, 1999

Colin Christensen
BLM-5100 E. Winnemucca Blvd.
Winnemucca, NV 89445

Subject: PMUD - Little Owyhee

Dear Colin,

The Commission for the Preservation of Wild Horses remains concerned with the re-evaluation and proposed decision affecting the Little Owyhee Wild Horse Herd.

During the original evaluation in 1992 and decision in 1993, the Commission disagreed with the District in its determination of an appropriate management level for the Little Owyhee herd. The original evaluation did not disclose the data analysis that determined the allotment's carrying capacity or forage allocation. In the settlement of the protest, the District disclosed that use pattern mapping data of forage within a five mile radius of the herd management area waters that determined the appropriate management level.

The re-evaluation does not present new data or allocate forage nor does it validate the 1993 decision - AML. Rationales for the proposed decision are in conflict. As stated in the re-evaluation, the AML was determined by available water and not forage, when in fact forage was a major factor in 1993. If range suitability analysis were applied the present livestock permitted use would be significantly reduced.

In the settlement of the allotment decision protest, the Commission agreed with the District that specific monitoring studies would be conducted to determine wild horse use of key areas. The re-evaluation found that when the Rock Spring Pasture was used exclusively by wild horses and wildlife during 1995 and 1996 that utilization was measured at zero percent. This study clearly shows that both these users are far below their carrying capacities. Forage should be allocated to wild horses and wildlife in the Final Multiple Use Decision.

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Population modeling of wild horse herds is essential to their viability. The Commission concurs with the District's assessment that continued gathers of younger animals will lead to a population crash. Data from the original gather can determine the mortality rate of wild horses 9 years and greater. Similar data collected from other gathers show that wild horses older than 15 years number less than 5% of the herd. This data suggests that significant numbers do not survive until 25 years and the data in Appendix 2 illustrates the older age class of existing herd, which may have been the result of the past herd that exceeded 2,000 animals. Simply stated, the present herd model does not take into account the mortality rate of these older animals in the Little Owyhee Wild Horse Herd. Without additional data, the older two thirds of this herd could be dead next year, subject to normal longevity factors. A management solution of just releasing other horses from foreign herds may violate the integrity of the herd as protect by the Act.

In general, we are encouraged that the past decisions, improvement projects, intensive livestock grazing and wild horse actions have met allotment objectives and improved wild horse habitat. However, there is need to better collect and assess data in perspective to wild horses. In situations such as the Little Owyhee, significant actions have taken on wild horses, this data needs to be fully understood and not just shelved for perpetuity.

If you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Cathy Barcomb". The signature is written in dark ink and is positioned above the printed name.

CATHY BARCOMB
Administrator