

4-12-94

September 12, 1994

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

Subject: **Snowstorm** Herd Removal Plan/ Draft EA

Dear Mr. Neary:

The Commission for the Preservation of Wild Horses continues to be concern with the removal and re-structuring of the Snowstorm 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 draft 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. However, this would reduce the number of horses removed and require addition reductions in livestock retain use within the allotment's carrying capacity. 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 herd's 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 Little Owhyee 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