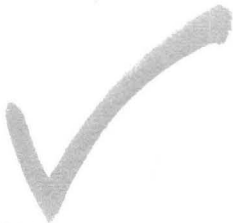


m 10/18/93

BOB MILLER
Governor

STATE OF NEVADA

CATHERINE BARCOMB
Executive Director



**COMMISSION FOR THE
PRESERVATION OF WILD HORSES**

50 Freeport Boulevard, No. 2
Sparks, Nevada 89431
(702) 359-8768

- COMMISSIONERS**
- Paula S. Askew, *Chairperson*
Carson City, Nevada
 - Steven Fulstone, *Vice Chairman*
Smith Valley, Nevada
 - Michael Jackson
Las Vegas, Nevada
 - Dan Keiserman
Las Vegas, Nevada
 - Dawn Lappin
Reno, Nevada

October 18, 1993

Bud Cribley, Area Manager
Sonoma-Gerlach Resource Area
705 East 4th St.
Winnemucca, Nevada 89445

Dear Mr. Cribley,

Thank you for the opportunity to review and comment on the Leadville Allotment Evaluation. Our comments are as follows:

Page 10: Please explain how the topography influenced the annual precipitation in 1990. How did you come to this conclusion?

Page 11: Why were key areas only checked and monitored in 1988?

Page 14: How can the Resource Area have a Habitat Management Plan, as stated on page 5, with objectives to meet and not have collected any wildlife habitat data during the evaluation period? The question then becomes, how can you make any logical recommendations with little or no wildlife data or riparian habitat data?

Page 29: In appendix 1, you use 115 head of horses from 1/1/89 through 2/28/89 for your calculations. Yet on page 9, you show 309 horses in the allotment for the entire year and state this is a result of natural immigration or adjacent capture operations. You can't have it both ways if more horses were indeed present on the allotment this would increase the amount of available forage. Why wasn't 1991 used in the calculations? Horses only used the allotment and the amount of heavy use was substantially less. If this information was used, Average Potential Stocking Level would be 3394 AUM's or 1832 for wild horses. If you are not going to use it because of above average ppt levels then state this and don't try to run it past in a plethora of calculations.

Page 34: You are considering foals in your actual use calculations. How can a foal born in February or March be considered equal to a full grown horse when considering forage utilization?

Bud Cribley, Area Manager
October 18, 1993
Page 2

Page 22: What will happen to livestock numbers if horse numbers can not be reached due to the Strategic Plan for Wild Horses? Will livestock numbers be reduced accordingly or will you illegally authorize grazing at a level above the carrying capacity?

Page 23: There seems to be too much discrepancy between the AUM totals for the pastures in alternative 1. Two pastures receive 352 AUM's of use while the remaining pasture receives 587 AUM's of use plus any horse use that may occur. You do not give any rationale behind your two proposed grazing systems. Please provide rationale for your proposals.

Page 24: You should have already some idea of the range improvements that are necessary to improve distribution. Projects that are viable but in a state of disrepair are the responsibility of the permittee to maintain. Why propose new range improvements when the permittees are not taking care of the projects they now have?

When will wildlife monitoring start? This is one of many evaluations that have no wildlife monitoring. Does the area have a viable wildlife program? It appears not.

Page 1: You state that the grazing permit is in the process of being transferred. How many AUM's of active use were transferred, 1291 or 2567? Please provide this information on the number of AUM's transferred. With the knowledge of this evaluation only 1291 Active AUM's should have been transferred.

The proposed proportional reductions will not be effective unless you can show how this in combination with proper management will keep the use of the riparian habitat at or below allowable use levels.

The re-evaluation schedule is entirely too long for the limited information that you have gathered on this allotment. These evaluations are part of your responsibility and we do not want the re-evaluation put off until 2002!

Sincerely,



CATHERINE BARCOMB
Executive Director

WHO A

WILD HORSE ORGANIZED ASSISTANCE
P.O. BOX 555
RENO, NEVADA 89504



... a note from

Dawn Y. Lappin

October 18, 1993

Bud Cribley, Area Manager
Sonoma-Gerlach Resource Area
705 East 4th St.
Winnemucca, Nevada 89445

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DAWN Y. LAPPIN
Director