

6-18-01

June 18, 2001

Ms. Susan T. Stokke
Bureau of Land Management
Surprise Field Office
P. O. Box 460
[REDACTED] California 96104-0460

Subject: High Rock HMA/Gather Plan

Dear Ms. Stokke:

The Commission for the Preservation of Wild horse remains concern with the management of wild horse herds in Washoe County, Nevada. Our agency appealed the 1993 environmental assessment and record of decision. At that time, the appropriate management levels were not based upon good science and impacts of the catastrophic winter of 1993 had significant adverse impacts to wild horse herds within your District and the Winnemucca District. The fact that IBLA upheld your decision was not based upon the merits of our concerns or issues.

Previous appropriate management levels for home ranges within High Rock Herd Management Area were based upon the observation of 55 horses in 1992. It now appears that after eight years, the BLM gathered 210 horses in 2000 and censuses the area in 2001 to find 413 horses. It is difficult to follow the trend in population data. The present population estimates have no rationale or model in the document. It would appear that the Herd Management Area might have immigration of wild horses from other herd areas.

Since the herd has had recent gathers, it would suggest the BLM have wild horse age, sex, longevity and color data to assess this herd's integrity. It would be appropriate to predict the population model and propose the post-gather herd composition and structure.

The recently designated Natural Conservation Area and Wilderness Areas may have a significant impact of the Bureau of Land Management's ability to gather wild horses. While the traps are outside of the wilderness areas, the contractors may have limitations on air operations. The Gather Plan should address any possible limitation due to wilderness designation.

We appreciate the Bureau's efforts to distinguish wild horse impacts to key management areas within the Herd Management Area. Your Field Office's application of the Standards and Guidelines to livestock authorizations is similarly being applied in recent decisions. We appreciate the fair application of rangeland principles to all users.

Sincerely,

Catherine Barcomb
Administrator