



DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES
COMMISSION FOR THE
PRESERVATION OF WILD HORSES

885 Eastlake Boulevard
Carson City, Nevada 89704
Phone (775) 849-3625 • Fax (775) 849-2391
April 17, 2001

Susan Stokke, Field Manager
Surprise Field Office-BLM
PO Box 460, 602 Cressler St
Cedarville, CA 96104

Dear Susan,

The Commission for the Preservation of Wild Horses appreciates the efforts of the Surprise Field Office to implement the 2000 Range Health Standards for Northeastern California and Northwestern Nevada. These standards require allotment specific guidelines to protect key areas and rangeland health of the Wall Canyon Wild Horse Management Area.

The Wall Canyon Wild Horse Herd appropriate management level was established in 1993. The environmental assessment established this number based upon the assumption that wild horses were the sole user of riparian habitat. All affected allotments were shared with livestock, but the environmental assessment did not consider the affects of livestock. We therefore have serious questions about the AML of 15 wild horses for this herd area and the herd's genetic viability to survive the long term.

We assume that rangeland monitoring of this allotment has continued since 1993 and that new data is available to assess the viability of the AML.

While we have no record of an allowable use leave of 20% of key upland herbaceous vegetation being applied to wild horses on this allotment, we have no serious objection to the concept. It would be advantageous to the affected parties to be consulted on such matters.

Since one third of this allotment is now designated wilderness, the Commission has serious questions in respect to the management of wild horses. The use of a helicopter and mechanical traps are essential to the management of wild horses. In the event that wilderness prohibits these methods, it is highly unlikely that an appropriate management level would be achieved or maintained. Failure to properly manage wild horses could have serious affects on the proposed decision for livestock as well as the health of the wild horse herd.

Sincerely,

A handwritten signature in cursive script that reads "Catherine Barcomb".

CATHERINE BARCOMB
Administrator