



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

October 24, 2003

Owen Billingsley, Manager  
Surprise Field Office  
PO Box 460  
Cedarville, CA 96104

SUBJECT: Buckhorn and Coppersmith Wild Horse Capture Plan EA

Dear Mr. Billingsley,

The Commission for the Preservation of Wild Horses appreciates the effort to consult our agency. Appropriate Management Levels (AML) for these two wild horse herds were determined six years ago in independent environmental assessments that evaluated several years of monitoring data. It is BLM's obligation to monitor range conditions within these herd management areas (HMA) annually. This data is to adjust or validate the previous appropriate management levels. Data in the 2000 environmental impact statement (EIS) for Range Reform found degraded range conditions. It would be appropriate to evaluate all data to support the numbers in this document.

If no new data has been collected to suggest a change in AML, then why consider a gather? As stated by your personnel, no change in habitat which would suggest that current numbers of animals on the range are in concert with a thriving ecological balance. There has been no data presented that would justify a gather of horses at this time.

During the previous gather in 1997, wild horses were processed near Gerlach. Mr. Ron Hall collected data on age, sex, color and other herd population data to determine the character of these herds. This data has not been presented in this environmental assessment. This data should assess the selective management actions taken in the previous gather. The document did not state if the 1997 gather achieved the appropriate management levels for these herds.

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If the BLM never achieved AML in 1997, how can this EA make any conclusions about meeting a thriving natural ecological balance in the future?

The proposed action to gather to the 1995 appropriate management level and release the herds' age, sex and color composition to the herd management area has good merit. However, there is no data presented to support that this will result in a genetically viable herd. Studies to support the immuno-contraceptive treatment are not footnoted or included in this environmental assessment. Since thousands of Nevada wild horses have been treated, some data and literature should be provided to support treating all mares to be released.

Provisions of the Act require each herd to be managed independently to protect its uniqueness. Augmenting these herds could violate the intent of the Wild Horse and Burro Act.

Since this document is an EA for a proposed gather, we look forward to reviewing the gather plan which should be including all of the above requested information to justify this action.

If you have any questions, please don't hesitate to contact me.

Sincerely,



CATHERINE BARCOMB  
Administrator