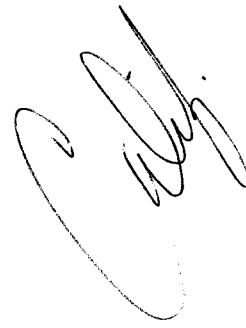


6-14-04



June 14, 2004

Mr. Owen Billingsley
Bureau of Land Management
Surprise Field Office
P.O. Box 460
Cedarville, California 96104-0460

RE: Fox-Hog Wild Horse Gather

Dear Owen:

The Nevada Department of Wildlife appreciates the Surprise Field Office's effort to prepare necessary environmental clearances for the gathering of wild horses in the ~~Surprise Field Office~~ ~~Area~~. We encourage the Field Office to update and adjust the appropriate management level with current data and land use plan objectives. At the time of the Bare Allotment Decision, the Resource Advisory Committee was preparing the Rangeland Health Standards and Guidelines. A recent proposed decision from the Las Vegas Field Office implemented a three tiered assessment that considered the suitability of the herd management area; this process could lend itself useful for this decision.

New efforts to gather wild horse numbers to 40% below the appropriate management level may result in less gathers and lower costs in managing wild horses in the long term. We support the use of immuno-contraceptive vaccines and suggest that the marking and follow-up studies be done to confirm this new direction in population control.

The limiting factor to the appropriate management level is the use and impacts to riparian habitats in the herd management area. Livestock and wild horses jointly use these key habitats each year. Rangeland monitoring data should full assess the use and impact by each ungulate to determine proper stocking rates or forage allocation. Rangeland Standards and Guidelines require meeting proper use criteria and these Guidelines are reinforced in the Nevada

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Sage Grouse Conservation Plan. While reducing the impacts to these critical areas is an important action, meeting Guidelines are required by present regulation.

Private holdings and water sources can have a significant effect on the status of this herd management area. The three-tier assessment would evaluate the herd management area and make necessary adjustments in accordance to the Act.

If there are any questions or need for additional input, please contact Mr. Chris Hampson, Wildlife Biologist, 688-1567.

Sincerely,

Roy Leach
Western Region

REL
cc. Habitat, Reno
Chris Hampson