



**COMMISSION FOR THE  
PRESERVATION OF WILD HORSES**

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(702) 688-2626

March 25, 1996

Ms. Susan Stokke  
Surprise Resource Area  
Bureau of Land Management  
602 Cressler Street  
P.O. Box 460  
Cedarville, CA 96104

Subject: Tuledad EA/Proposed Decision

Dear Ms. Stokke:

The Commission for the Preservation of Wild Horses is encouraged with the Surprise Resource Area's preparation of an environmental assessment for the 1996 and long term grazing permits for the Tuledad Allotment. Since the completion of the Tuledad Allotment Management Plan in 1980, the Bureau has been managing this allotment in an informal manner with annual adjustments made by the permittees. Your recent manager's decision for the wild horse gather of the Tuledad Wild Horse Herd was based upon rangeland monitoring data collected on just a few years from only several riparian key areas. Though the environmental assessment (CA-028-96-09) makes reference to new rangeland monitoring data, we fail to find any data presented in the document.

Administrative appeals to the Interim Grazing Decision of 1992 were resolved with a Stipulated Agreement with the state wildlife agencies in 1993. The Stipulated Agreement provides specific guidelines for this Proposed Decision.

Key bitterbrush areas and the three-way monitoring studies were to determine the ungulate use of bitterbrush forage on the allotment. These studies have been in place during several grazing system cycles and should provide insight on domestic sheep use of bitterbrush. Since domestic sheep prefer browse species yearlong, spring and fall use of bitterbrush by sheep should have been quantified.

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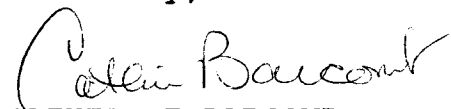
Bitterbrush is not used by wild horses. Burned areas that have been planted with bitterbrush seedlings could benefit by wild horse spring use of these burns. Studies in Utah have confirmed wild horses having benefited mule deer habitat. The lack of consultation on affected burns leaves the Commission confused on what existing vegetational or desired plant community objectives for these burns.

The Proposed Action separates from the existing allotment management plan and Interim Decision by implementing prescribed grazing practices required to meet the utilization standards. This action requires intensive monitoring with mandatory herding by the permittee. The environmental assessment did not present an alternative to adjust the stocking rate to achieve the utilization standards. Carrying capacity computations could be based upon the use pattern mapping data collect in 1994 and 1995. We suggest this alternative be considered.

In order to be successful in meeting utilization standards, the pending authorizations must have a term or condition requiring the removal of livestock prior or at attainment of the proper use. The Stipulated Agreement specifically addresses a seven day removal period for livestock after monitoring data indicates a utilization standard is or about to be achieved. This stipulated measure or permit term would better comply with 43 CFR 4100 Subpart 4120. Federal regulation require terms and conditions defining management actions necessary to achieve allotment specific resource objectives.

Susie, we are encouraged and excited about the Surprise Resource Area implementing our Stipulated Agreement for the Tuledad Allotment. The removal of over 50 percent of the wild horses is now a part of a comprehensive effort to restore and protect critical habitats important to wild horses and wildlife on the allotment. Intensive monitoring continues to be priority obligation and duty of the Bureau of Land Management to better manage our public lands and reduce the controversy generated by the affected interests. We enjoy the new leadership and efforts to resolve these resource problems.

Sincerely,



CATHERINE BARCOMB  
Executive Director