

2-1-96

February 1, 1996

Tony Danna
Surprise Resource Area
Bureau of Land Management
P.O. Box 460
Cedarville, California 96104-0460

Subject: DEA Buckhorn and Coppersmith Herd Gather Plan

Dear Mr. Danna:

The Nevada Commission for the Preservation of Wild Horses is very concern with the management of the Buckhorn and Coppersmith Wild Horse Herds and their habitats. As numerously stated to the District, the establishment of appropriate management levels must be determine through rangeland monitoring data as defined by the 1989 IBLA Decision. As your legal defined duty, the attached Stipulation Among Parties For Change in Decision and Withdrawal of Appeal specifically details what actions the District must preform to relieve the issues of our appeal to the Tuledad Allotment's District Manager's Decision dated April 15, 1992. We find it appalling that the Stipulation was disregarded by the Bureau in its grazing authorizations in 1994 and now fails to determine a carrying capacity to allocated available forage to wildlife, wild horses and livestock on this allotment.

As an appellatnt to the 1992 District Manager's Decision, the Commission, as well as numerous other affected interests, withdrew appeals in trust of the December 28, 1993 sign Stipulation between the Bureau of Land Management and state wildlife agencies. Draft Environmental Assessment CA-028-94-08 does not present or analyze use pattern mapping data and actual use data for wild horses or livestock on the Tuledad Allotment. The simple extraction of a one time winter census and survival prediction to determine carrying capacity is unfounded and is contrary to the Stipulation, federal regulation and Bureau policy regarding this matter.

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We strongly suggest that the District revisit its sign Stipulation prior to issuing any decision regarding this allotment.

Sincerely,

Catherine Barcomb
Director