



**COMMISSION FOR THE
PRESERVATION OF WILD HORSES**

255 W. Moana Lane

Suite 207A

Reno, Nevada 89509

(702) 688-2626

June 7, 1996

Ms. Julie Butler
Clearinghouse Advocate
Nevada State Clearinghouse
Blasdel Bldg., Rm. 200
Carson City, Nevada

Subject: DEIS/Spring Mountains NRA - SAI 96300167

Dear Ms. Butler:

The Commission for the Preservation of Wild Horses appreciates this opportunity to comment on the Draft Environmental Impact Statement and Preferred Alternative (Alternative M) - Amendment to the Land and Management Plan for the Spring Mountain National Recreation Area. We recognize and appreciate the extensive efforts of the Toiyabe Forest to consult affected interests throughout the planning processes.

The proposed Forest Plan Amendments establishes appropriate management levels for the Johnnie, Red Rocks and Spring Mountain Wild Horse Territories. According to our records, there were approximately six wild horse/burro herd use areas delineated for the original land use plans for the Forest and Bureau of Land Management. It is uncertain how or why these herd use areas were not considered herd management areas in both agencies' original land use plans. We can support the modification or abolishment of herd management areas if supportive criteria and data are provided in an environmental impact statement for land use plan amendment. The DEIS provides no data or rationale to support delineation of herd territories with Alternative M.

Alternative M establishes appropriate management levels that are arbitrary and capricious. Objective 0.16 determined the criteria to establish appropriate management levels based upon water, forage and animal condition. The DEIS presented no data pertinent to available forage or the animal condition. The selection of 7 percent allocation of available water was arbitrary. The DEIS presented no data or rationale for the allocation of water beyond

Ms. Julie Butler
June 7, 1996
Page 2

21 percent divided between elk and wild horses. Appropriate management levels for Red Rock and Johnnie Territories were not based upon any criteria presented in the DEIS.

Standard and Guideline must be consistent with current law and regulations. Guideline (0.94), to introduce wild horses into herds to increase the adoptable qualities of the herd, violates Federal Regulation 43 CFR 4710.4. Herd management is limited to the herd management area.

The exclusion of wild horses from Wilderness Areas is arbitrary. Historical uses of the lands that do not cause damage to the fundamental resources are permitted in wilderness areas. No data were provided to support any assumption that wild horses cause damage or jeopardized any one species of wildlife.

In summary, the DEIS/Preferred Alternative did not consider the legal obligations of the Forest Service to the Wild Horse and Burro Act of 1971. Proposed actions affecting wild horses are based upon unfounded presumptions that wild horses adversely affect the natural evolution of vegetation and wildlife species outside of man's influence. The Spring Mountain Range has had significant intervention of man by intense logging of Jeffery Pine, juniper, pinyon pine, fire protection, livestock grazing and fire reclamation.

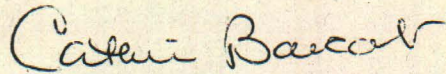
Wild horses are to be preserved as symbol of Nevada's historical past. Regulations require that wild horses be managed as viable herds in a thriving natural ecological balance with other resources. Appropriate management levels and herd management areas are to be determined based upon resource and monitoring data analysis to determine a thriving natural ecological balance. It would appear that the preferred alternative is a subjective judgement based upon an interpretation of broad ecological or biodiversity concepts. The mere lack of supportive data or rationale and need for research to validate the DEIS assumptions exposes the inadequacies of the preferred alternatives.

We suggest that the Forest seriously consider the development of standards and guidelines to collect monitoring data for the future adjustments in wild horse and burro numbers or herd management areas. This approach would be more consistent with the current federal regulations to administer the wild horse and burro program.

Ms. Julie Butler
June 7, 1996
Page 3

Please feel free to contact, Mr. Roy Leach, Biologist, at (702)
423-5270.

Sincerely,

A handwritten signature in cursive script that reads "Catherine Barcomb". The signature is written in dark ink and is positioned above the typed name.

CATHERINE BARCOMB
Executive Director