



**COMMISSION FOR THE
PRESERVATION OF WILD HORSES**

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November 2, 1995

Ms. Susan T. Stokke
Surprise Resource Area Manager
Bureau of Land Management
P.O. Box 460
Cedarville, California 96104-0460

Subject: Draft Buckhorn and Coppersmith Herd Management Area
Gather Plan and Environmental Assessment

Dear Ms. Stokke:

The Nevada Commission for the Preservation of Wild Horses appreciates the consultation concerning the proposed wild horse gather for these two herd areas. Previous management decisions for the Tuledad Allotment resulted in a series of administrative appeals by state resource agencies and affected interests. According to our records, an Appeal to the 1992 District Manager's Decision was settled by a Stipulation Among Parties of December 28, 1993. This agreement stipulated conditions for monitoring, evaluations and decisions to achieve a thriving natural ecological balance on the Tuledad Allotment. Previous comments to the draft wild horse gather environmental assessment advised the Resource Area of our legal agreement and encouraged better compliance.

We appreciate the revision of the original draft and would like to provide the following comments:

ENVIRONMENTAL ASSESSMENT

Page 3 to 7, Law

The land use plan MFP III decisions established management numbers for the Buckhorn and Coppersmith Hills Herd Areas. Herd numbers and livestock active preferences were to be verified by rangeland monitoring data to be at carrying capacity by an established land use plan schedule (1986).

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A ruling by the Interior Board of Land Appeals on June 7, 1989 (88-591), further established your land use plan direction, found that the establishment of an appropriate management level for wild horses must be determined upon rangeland monitoring data. This ruling dismissed any appropriate management levels established in the land use plan, CRMP or Stewardship processes.

Page 10, Interim Grazing Decision

As previously stated, appeals to the 1992 IGD were settled by a stipulated agreement with the state wildlife agencies. This agreement required conditions and new decisions no later than 1994. We are not aware of any new grazing decision for the allotment since 1992.

Page 11, Need for Action

We agree the protection of riparian habitat is essential to the welfare of Nevada rangelands and wildlife species. Wild horses and livestock contribute to exceeding the utilization standards for riparian vegetation on key management areas of the allotment.

The Stipulated Agreement set a four inch stubble height or 50% utilization standard for key riparian species. The draft states 60% utilization as a standard.

Actual grazing use reports are not specific to key areas or use areas on the allotment. Actual use by livestock is not adequately documented to support your assumptions.

Page 18, Table 3

As shown for the Coppersmith and Buckhorn herds, there has been a steady increase in the population. The table does not support the proposed action's justification to reduce horses to prevent the observed "die-off" during the winter of 92-93. Census data in Table 5 do not show foals or recruitment data to support the assumed productivity for population estimates in Table 3.

Page 22, Monitoring

New regulations require rangeland and riparian functional condition assessments. The BLM policy to restore 75 percent of riparian areas to proper functional condition was established in 1991. The environmental assessment does not disclose any data concerning functionality tests.

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Actual Use Reports are incomplete and not specific to key management area, pasture or livestock use areas (See 1988 Allotment Evaluation).

Page 24, Livestock

Allotment Evaluations and environmental assessments found that no grazing system has been adhered to on the Tuledad Allotment. It has been stated that the two pasture system was in place prior to the land use plan. The land use plan three pasture rest rotation system was never implemented and recent practices suggest a nine use area system. It was obvious during the drought year of 1992 that water had to be hauled to mitigate the loss of over half the available water on the allotment. This huge allotment has been use differently each year based upon available resources and the abilities of the permittee.

Proposed Action

Restructuring the herds to meet the BLM's Strategic Policy may not achieve a thriving natural ecological balance. It is unknown if AML will be reached by releasing all five year and older horses back into the herd area.

We support the reduction of horses within the allotment or herd areas to carrying capacity to avoid winter kills. In order to assure horses are within their carrying capacity, livestock numbers and season of use must be controlled to meet utilization standards for the allotment.

GATHER PLAN

Page 3, Population

The herds were gathered in 1989. Age, sex and recruitment data should have been collected to model the herds. Herd structure should be presented.

The herd was censused in August of 1995. The foal crop or recruitment rate was observed. This data should be provided. Is it assumed that all horses per herd were observed?

Page 4, Methods of Removals

Expected mortality should be presented. Roping of wild horses should be avoided or have strict contract criteria (See attach).

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Appendix 2

Page 2, Analysis

The actual use for Buckhorn wild horses is a herd estimate for 1992. Rangeland monitoring data was to replace the "one time inventory" approach of the land use plan. Monitoring data has been collected on this allotment for 15 years and riparian data for the past five. It would be appropriate use more than one year's data.

An animal unit month is equivalent to one adult horse.

The actual use for Coppersmith wild horses is the herd estimate for 1994. Again, this is only one year's monitoring data. Use of selective years is inconsistent and without rationale.

Census data collected on August 24, 1995 does not support the population estimates of the environmental assessment. The observed recruitment rate of 12 and 15 percent for Coppersmith and Buckhorn herds, respectively, does not account for overwinter mortalities. Without accurate measurements of actual use (livestock and wild horses) carrying capacities cannot be computed and forage allocated to use.

It was assumed that livestock did not use key areas. The appropriate management levels assume no livestock use within pastures that are annually licensed for livestock.

Appendix 5 Utilization

As stipulated in the agreement, Bud Brown and Ant Spring riparian areas were to be fenced by 1993. It would appear that conditions of our agreement are not met.

Appendix 6 Actual Use

Data is not sufficient to meet the assumptions of the environmental assessment. Actual use by livestock of the allotment is too vague and not relative to the establishment of a carrying capacity. This allotment is used by many permittees that graze cattle and sheep over the entire allotment each year. It is speculative to what the actual use may be on any key management area.

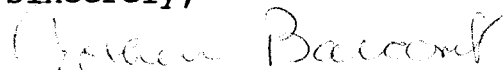
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SUMMARY

Please consider the comments provided to the draft. We are not opposed to reducing wild horse herds to a threshold level to achieve a thriving natural ecological balance. However, the reduction of wild horses will not achieve utilization standards without similar actions for livestock on the allotment.

Please include comments by other parties in the final document.

Sincerely,



Catherine Barcomb
Executive Director

cc.

Don Koch, CF&G, Redding