



DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES  
COMMISSION FOR THE  
PRESERVATION OF WILD HORSES  
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January 2, 2004

Mr. Robert Abbey, State Director  
Nevada, Bureau of Land Management  
1340 Financial Blvd  
Reno, NV 89502

Dear Bob,

Thank you for recently taking the time to attend our Commission meeting on November 14, 2003. We realize that you have many demands on your time and appreciate your attention to our concerns with the wild horse and burro program in Nevada.

I received your recent request to work with Susie Stokke for better coordination and understanding of our concerns, which I will be happy to do. Ms. Stokke has always been a pleasure to work with and has expressed a very special interest in the horse program in Nevada. We feel she will be able to improve on the program that Nevada has operated in the past.

Since you and I have had many personal meetings regarding our concerns I had felt you completely understood the issues. I have always felt that going to you personally was preferable to contacting the media or other outside groups. However, in your recent letter to Mike Turnipseed, it seems as though I may have not articulated the issues clearly enough for your understanding. I will address some of these issues in this letter to help you better understand our concerns as they affect our State and the wild horses and burros inhabiting our public lands.

Our interest has and always will be the health and well being of the wild horses and burros and the habitat they depend on for survival. Protection of the habitat, according to the Code of Federal Regulations, NEPA, FLPMA, and policy is critical for uniformity and public oversight. I have expressed our concerns to you that these laws are not always being followed by District personnel which is evident when reviewing the 7-800 land use planning documents (LUP) my office receives annually.

Bob Abbey, State Director  
January 2, 2004  
Page 2

In past years, Nevada BLM, had an internal review process by the State Wild Horse and Burro Lead, wherein that lead person would review all documents for compliance and uniformity between the Districts and compliance with LUP mandates. That internal review process has not occurred for over 10 years which in turn puts the documents out to the public for review. I realize this is a tremendous task for one person, as I do it myself, but when this was done internally, there were less conflicts with land use planning issues. In addition, it provided for the Lead person to understand all the issues being presented to the public and insure uniformity. Coordination and consultation was better at that time because every interested person could work through one Lead specialist if there were issues and that State Wild Horse and Burro Lead could mediate those concerns in addition to protecting BLM from lawsuits.

Recent discussions with District personnel and Ms. Stokke, has revealed that there is a serious lack of monitoring of the herds, censusing, recruitment documentation, and their seasonal movement. I have already discussed this with you in person in that some of the Districts have not flown nor have knowledge of horse movement for many years. It is impossible to determine habitat usage, recruitment, and movement without censusing. The figures BLM routinely uses in land use planning documents and public testimony are "estimated" numbers. Without accurate information, land use planning is a guessing game. Most recently when the Winnemucca District gathered Blue Wing the anticipated 1,100 horses and 200 burros were actually 5-600 horses and less than 100 burros. The District could not assure us that any horses survived in that area. In addition this negates any land use planning documentation because of inaccurate census information providing usage by horses.

Ms. Stokke has recently sent us information on AML's in Nevada. I do not believe that some of those area's that were presented to have AML, actually have an AML that was established under current regulations and NEPA. Old LUP numbers were thrown out in 1989 by IBLA and some of the numbers presented were "estimated" numbers in addition to numbers being used to "monitor for" as opposed to actual AML numbers established through the LUP legal process.

The State of Nevada is in need of accurate information to determine the status of wild horse management by BLM in our State, which is critical to us all. When information is provided as estimated information it is hard to determine exactly how many horses and burros reside in Nevada and if we are truly over AML or not. To address our concerns I need 1) an update of AML's by allotment and how they were established and; 2) the dates of the last physical aerial census counts for each HMA and census count information.

Another issue that has recently been expressed is BLM's direction to move away from the Multiple Use Decision Process (MUD) to horse decisions only in an attempt to

Bob Abbey, State Director  
January 2, 2004  
Page 3

reach AML by a specified date. When all uses are covering the same habitat it seems impossible to determine appropriate use of the habitat and especially the carrying capacity of the range when only part of the entire picture is being presented. The MUD process was developed in Nevada years ago and insures sound range management for all users. We would encourage you to provide direction to all of your field personnel to continue to follow the MUD process in all land use planning in Nevada.

We look forward to receiving the information we've requested and working with you and Ms. Stokke on resolutions to any issues that may arise. If you have any questions, please don't hesitate to contact me.

Sincerely,

**CATHERINE BARCOMB**  
Administrator

cc: Mike Turnipseed, Director  
Steve Robinson