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Jon Raby, State Director
Bureau of Land Management, Nevada State Office
1340 Financial Blvd.
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Dear Mr. Raby:

We appreciate your staff's efforts in presenting to the Sagebrush Ecosystem Council (SEC) on December 8, 2022, about progress in managing National and Nevada Wild and Free-Roaming Horse and Burro populations. As you know so well, getting horse and burro populations to a thriving natural ecological balance and other multiple use relationships in each herd management area is extremely important to ecological function of sagebrush ecosystems and to many greater sage-grouse populations in so many of their population management units.

We are very pleased with the progress made in the past two years by BLM nationally in curbing the 12-year 322% increase in on-range horse and burro populations. We recognize that addressing the problem nationally is important to Nevada since once the Nation has achieved appropriate management level, the number of additional horses and burros that must be gathered to stay at Appropriate Management Levels (AML) can be adopted by the public each year. This will be a game changer, greatly reducing costs for gathering and caring for horses off-range. It will also be a game changer on-range with ecosystems finally allowed to heal and thrive so that native wildlife, horses and burros, and multiple use can also thrive.

We also recognize that it is challenging for the BLM, Forest Service and indeed the Nation and Congress to focus on this issue and balance what is necessary to make it sustainable and low cost and continue to allocate the funding needed to make it reality. We therefore urge the BLM to continue using its recent data to inform the public and share their vision for a sustainable alternative, while continuing to have the wisdom to invest resources wisely to make it a reality.

Perhaps our recent experiences can be a beacon for insight. Had the Nation invested in gathering 6,572 more excess horses and burros in 2007 we would have gotten to the midpoint between high and low AML. If Nevada had gotten close to this level and then been able to use a combination of 1.) Gathering and adopting the young more adoptable horses; 2.) Incentivizing willing adopters who did not have the financial wherewithal to start a long-term adoption during the Great Recession; and 3.) Using the emerging technologies of fertility management, we believe that populations would have remained at

AML. Thus, gathering and placing into off-range holding less than 10,000 horses in 2007 would today mean 50,000 fewer horses in off-range holding sites and 60,000 fewer excess horses on-range, where they now exceed AML by more than 300%.

With a national gather of 20,193, we are making progress. It is great to see the populations trending toward AML. As the SEC discussed in December, it will take a multi-year strategy and analyses to achieve and maintain AML. To achieve this, Congress will need to focus on the current increasing and accumulating costs of allowing on-range reproduction of horse populations that continue to exacerbate AML crisis in Nevada. Fertility management will ultimately be quite useful, but in the meantime, it does not get populations far above AML to AML. Excess on-range populations are damaging habitats important to greater sage-grouse and all rangeland wildlife and multiple uses.

We saw in your report that BLM has successfully worked to build infrastructure for processing gathered horses in Nevada. We hope that fixing the lack-of-infrastructure problem that you previously reported to us, will now enable the BLM and Forest Service to make great strides in Nevada. However, the gather of 8,264 and removal of 7,461 horses and burros from within the part of BLM reported as Nevada, implies that with 56% of the national population and 60.7% of the excess on-range horses, Nevada only benefitted by receiving 37% of the national gather in 2022. This has us concerned. Hopefully with the infrastructure in place in Nevada (or elsewhere as needed) we can get to the important work of getting to AML. The research of Peter Coates, USGS, shows that achieving and maintaining AML is critically important to greater sage-grouse and their habitats in Nevada.

We note that the administration requested budget of \$153 million was not fully funded (\$148 million for the wild and free-roaming horse and burro budget in FY2023) and would not be adequate to achieve AML in five years as is the optimal goal (\$176 million plus inflation for FY 2023). Since getting to AML is necessary to achieve future prosperity, and since getting to AML sooner is much cheaper than getting to AML later, can funds for the Bilateral Infrastructure Bill be used for this purpose?

If not, can funds for this program be provided in the five-year Farm Bill or in some other long-term funding package that would allow for the full funding of the multi-year vision of getting to AML? We believe that this would avoid the ongoing damage to Nevada wildlife and ecosystems and would be better for on-range horses and burros as well as for those gathered, fed, and placed on private pastures. It would certainly be more humane than going hungry or thirsty on overpopulated Nevada herd management areas grossly above AML. Furthermore, recently published modeling suggests that gathering and removing excess horses to achieve AML will also result in less long-term gathering, even with full implementation of fertility management.

Again, thank you for reporting again to us about the BLM progress in this vital issue. We remain eager to see progress toward the critically important goal of getting to AML and staying at AML. We will continue to support full funding, continued management, and the implementation of long term plans to achieve and maintain wild horse and burro populations at AML. As you are well aware, our statutory obligation is to advocate for and implement conservation measures to conserve, rehabilitate, and protect the sagebrush ecosystem, its wildlife, multiple uses, and responsible uses of its natural resources.

Sincerely,

Chris MacKenzie

Vice-Chairman

Cc:

DOI Secretary/Undersecretary

BLM National Director

NV Congressional Representatives

Governor Lombardo