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**STATE OF NEVADA**  
**Sagebrush Ecosystem Program**

April 8, 2014

Honorable Senator Dean Heller [*Individualized identical letter to each Delegation Member*]  
324 Hart Senate Office Building  
Washington, DC 20510

Senator Heller,

At the Sagebrush Ecosystem Council's meeting on March 13, 2014, the Council adopted policy for the State of Nevada regarding Wild Horse and Burro management in the state. Our effort is to improve management actions within the boundaries of Nevada, and diminish damages currently being suffered upon our public lands by unmanaged ungulates. We have submitted this set of policies, attached to this letter, to both the Bureau of Land Management and the US Forest Service, in an effort to have them implemented through the current Sub-regional Environmental Impact Statement (EIS) and presumed changes to district level Resource Management Plans.

Furthermore, during our meeting on April 8, 2014, it was unanimously approved by the Council to send a letter to you, providing you with the attached copy of our policies. We hope this is helpful in efforts we hope you are able to take, to improve the management surrounding the Wild Horse and Burro issues in Nevada.

Although developed specifically for the EIS, we also anticipate this initial policy document will be included in our "State Plan" for the Sagebrush Ecosystem. We welcome your input and any assistance you can provide with this process as we move forward in the next few months.

Thank you again for your past work on this issue. If we can be of further assistance, please don't hesitate to contact Tim Rubald our Program Manager, or members of the Council.

Sincerely,

J.J. Goicoechea, Chairman  
Sagebrush Ecosystem Council

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# Goals and Objectives: Wild Horses and Burros excerpts for the revised State of Nevada Alternative

Alternative E – State of Nevada Alternative (Revised by the SETT with guidance from the SWG February 2014)

## Color Code

**Existing Language**

*Proposed Language*

*Goal E-WHB 1: Support, promote, and facilitate:*

- *Full implementation of the Wild Free-Roaming Horses and Burros Act of 1971 as amended, including to preserve and maintain a thriving natural ecological balance and multiple-use relationship, without alternation of its implementation by subsequent Congresses or Presidential administrations.*
- *Maintaining healthy and diverse wild horse and burro populations in the State of Nevada in a manner that meets GRSG habitat objectives (see Table 2.6).*
- *Focusing expenditures of appropriated funds on management of wild horses and burros on public lands over care in captivity.*

*Acknowledge that if action is not taken until herd health has become an issue, the range and water resources are likely to be in a highly degraded and potentially irreversible state. Non-active management (e.g. let nature take its course, wait until horse health or resource conditions are critical) is not acceptable management.*

*Recognizing that non-management is not acceptable, avoid negative or potentially irreversible consequences that will occur within the SGMA due to non-active management. Use all tools available and actively manage wild horses and burros within HMAs and WHBTs.*

**Goal E-WHB 2: TMA-11.1: Maintain wild horses at Appropriate Management Levels (AMLs) in designated Horse Management Areas (HMAs) throughout the Sage-grouse Management Area (SGMA)**

*Goal E-WHB 2: As authorized in the Wild Free-Roaming Horses and Burros Act of 1971, achieve and maintain wild horses and burros at or below established AMLs within the SGMA and manage for zero horse populations in non-designated areas within the SGMA to reduce impacts to Greater sage-grouse (GRSG) habitat.*

*Goal E-WHB 3: Strive to resolve the conflicts between the Endangered Species Act and the implementation of the Wild and Free Roaming Horse and Burro Act to ensure maintenance of GRSG habitat.*

**Objective E-WHB 1: TMA-11.2: Evaluate conflicts with HMA designations in SGMAs and modify LUPs to avoid negative impacts on GRSG. If necessary, resolve conflicts between the Wild and Free Roaming Horse and Burro Act and the ESA.**

*Objective E-WHB-1: Meet established AML levels in all HMAs and WHBTs in Core, Priority, and General Management Areas within five years.*

**Objective E-WHB 2: TMA-11.2: Evaluate conflicts with HMA designations in SGMAs and modify LUPs to avoid negative impacts on GRSG.**

**Objective E-WHB 3: See Role of Sagebrush Ecosystem Technical Team.**

*Objective E-WHB 3: Prioritize gathers for removal and/or population growth suppression techniques in HMAs, HAs, and WHBTs first within the State's Core Management Areas and then within the Priority and General Management Areas. Additional prioritization should be given for HMAs and WHBTs that are near AML or where a reduction would serve the most beneficial purpose. Proactively and adaptively manage herd sizes taking into consideration climate variability and other natural phenomena, similar to the restrictions placed on livestock managers.*

# Management Actions: Wild Horses and Burros excerpts for the revised State of Nevada Alternative

Alternative E – State of Nevada Alternative (Revised February 2014)

## Color Code

Existing Language

Proposed Language

Action E-WHB 1: TMA-11: Manage wild horses at AMLs to avoid and minimize impacts on SGMAs.

*Action E-WHB 1: Even if current AML is not being exceeded, yet habitat within the SGMA continues to become degraded, at least partially due to wild horses or burros, established AMLs within the HMA or WHBT should be reduced through the NEPA process and monitored annually to help determine future management decisions. Unless already meeting the lowest established AML level, during periods of drought, AMLs should be reduced to a level that is consistent with maintaining GRSG habitat objectives (see Table 2.6).*

Action E-WHB 2: TMA-11: Manage wild horses at AMLs to avoid and minimize impacts on SGMAs.

*Action E-WHB 2: Ensure that Herd Management Area Plans (HMAP) and WHBT plans are developed and/or amended within the Core, Priority, and General management areas, identified in the State's management areas map, taking into consideration the GRSG habitat objectives (see Table 2.6).*

Action E-WHB 3: TMA-11: Manage wild horses at AMLs to avoid and minimize impacts on SGMAs.

*Action E-WHB 3: Methods that were used to initially establish AMLs should be reevaluated to determine if they are still sufficient to achieve GRSG habitat objectives (see Table 2.6).*

Action E-WHB 4: See Role of Sagebrush Ecosystem Technical Team.

*Action E-WHB 4: Use professionals (botanists, rangeland ecologists, wildlife biologists, hydrologists, etc.) from diverse backgrounds to conduct land health assessments, proper functioning condition, site specific wild horse and burro grazing response indices assessments, and habitat objective assessments.*

Action E-WHB 5: See Role of Sagebrush Ecosystem Technical Team.

*Action E-WHB 5: When implementing management activities, water developments, or rangeland improvements for wild horses or burros, consider both direct and indirect effects on GRSG and*

*use the applicable Site Specific Consultation Based Design Features (SSCBDF) (see Appendix A) to minimize potential impacts or disturbances.*

### **Proposed New Action Items**

*Action E-WHB 6: Given their capability to increase their numbers by 18%-25% annually, resulting in the doubling in population every 4-5 years (Wolfe et al. 1989; Garrott et al. 1991), wild horse gathers should be conducted to attain the lowest levels of AML. This in combination with continued and expanded use and development of effective forms of population growth suppression techniques will enable AML to be maintained for longer periods and reduce the frequency of gathers and associated cost and effort.*

*Action E-WHB 7: In order to expedite recovery time and enhance restoration efforts following wildfire or GRSG habitat enhancement projects, consider a significant reduction and temporary removal or exclusion of all wild horses and burros within or from burned areas where HMAs and WHBT overlap with GRSG Core, Priority, and General Management Areas. Wild horse grazing behaviors and specialized physiological requirements make unmanaged grazing on recently burned/ treated areas problematic for reestablishment of burned and/or seeded vegetation. (Arnold and Dudzinski 1978, Rittenhouse et al. 1982, Duncan et al. 1990, Hanley 1982, Wagner 1983, Menard et al. 2002, Stoddart et al. 1975, Symanski 1994).*

*Action E-WHB 8: If current AML is being exceeded, consider emergency short-term measures to reduce or avoid degradation of GRSG habitat from HMAs or WHBT that are in excess of established AML levels within the SGMA.*

*Action E-WHB 9: If monitored sites are not meeting GRSG habitat objectives in Table 2.6, even if AML is being met, and it is determined that wild horses or burros are the primary causal factor, then implement protective measures as applicable in addressing similar emergencies (e.g. fire, flood, drought, etc.).*

- *Consider exclusionary fencing of riparian or other mesic sites and implement water developments (following the SSCBDF as described in Appendix A) to ensure dispersal or avoidance of sites heavily impacted by wild horses (Feist 1971, Pellegrini 1971, Ganskopp and Vavra 1986, Naiman et al. 1992). A water source that meets the SSCBDF should be provided, as horses traditionally do not leave known water sources just because they are fenced.*
- *Plan for and implement an immediate reduction in herd size to a level that would enable the area to recover to meet the habitat objectives in Table 2.6 and to preserve and maintain a thriving natural ecological balance and multiple-use relationship in that area. Consider lowering the AML levels to prevent future damage.*

*Action E-WHB 10: Implement a telemetry monitoring program for wild horses. Research regarding the direct interactions between, and in indirect effects of wild horses and GRSG is identified as a need and could further assist the agencies in the development of habitat selection*

*maps (Beever and Aldridge et al. 2011) as well as offer a general understanding of the intensity, timing, and duration of use by wild horses within the SGMA.*

*Action E-WHB 11: Work with professionals from other federal and state agencies, researchers at universities, and others to continue to develop, expand, and test more effective population growth suppression techniques, including contraception options.*

### **Climate Change-WHB**

*Action E-WHB-CC 1: See Role of Sagebrush Ecosystem Technical Team.*

*Action E-WHB-CC 1: As climate data becomes available, adjust wild horse and burro and rangeland management practices to allow for Core, Priority, and General Management Areas to sustain or increase their sagebrush ecosystem resiliency and resistance.*

*Action E-WHB-CC 2: See Role of Sagebrush Ecosystem Technical Team.*

*Action E-WHB-CC2: Collaborate with weather and climate professionals and agencies (UNR, DRI, NOAA, etc.) to proactively manage the rangelands resources and adjust, as necessary, the current wild horse and burro management policies. Ensure that sufficient ongoing public and political education is provided.*

### **Literature Cited:**

Beever, E.A., and C.L. Aldridge, 2011. Influences of free-roaming equids on sagebrush ecosystems, with a focus on Greater Sage-Grouse. Pp. 273-290 in S.T. Knick and J.W. Connelly (editors). Greater Sage-Grouse: ecology and conservation of a landscape species and its habitats. Studies in Avian Biology (vol. 38), University of California Press, Berkeley, CA.