



**Sagebrush Ecosystem Council**

**JJ Goicoechea** (C) Local Government Representative  
**Chris MacKenzie** (VC) Board of Wildlife Representative  
**Allen Biaggi**- Mining Representative  
**Steve Boies**- Ranching Representative  
**Gerry Emm**- Tribal Nations Representative  
**Starla Lacy**- Energy Representative  
**Bevan Lister**- Agriculture Representative  
**William Mollini**- Conservation & Environmental Representative  
**Sherman Swanson**- General Public

**Sagebrush Ecosystem Technical Team**

**Kelly McGowan**, Program Manager  
**Dan Huser**, Forestry/Wildland Fire  
**Katie Andrie**, Wildlife  
**Vacant**, Agriculture  
**Kathleen Petter**, State Lands

**STATE OF NEVADA**  
**Sagebrush Ecosystem Program**  
201 S. Roop Street, Suite 101  
Carson City, Nevada 89701  
Telephone (775) 684-8600  
[www.sagebrusheco.nv.gov](http://www.sagebrusheco.nv.gov)

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Dear...:

The Nevada Sagebrush Ecosystem Council is a governor appointed council that collaborates with landowners, tribal nations, non-governmental organizations, local, state, and federal agencies in order to address and mitigate the threats related to the sagebrush ecosystem and to the Greater Sage-Grouse (sage-grouse) specifically. This council is increasingly concerned about the continued Wild Horses and Burros (WH&B) population growth, inability to maintain or reach Appropriate Management Levels (AML) in many areas, the impacts occurring within the sagebrush ecosystem and the overall health and welfare of the WH&B in Nevada.

The Bureau of Land Management (BLM) WH&B Advisory Board has released the list of recommendations that came from their discussions regarding the WH&B situation in the West. As of March 1, 2017 it is estimated that a total of 72,674 WH&B exist throughout the West. The Bureau of Land Management has determined that the Appropriate Management Level (AML), the number of WH&B that can thrive in balance with other public land use, is 26,715. That is 2.72 times more than the land can sustain, and the native wildlife, WH&B, recreationists, livestock operators, and our rangelands are realizing the consequences.

Without management, the WH&B population on the range can increase 18-25 percent annually (Wolfe et al. 1989; Garrott et al. 1991). In the absence of effective management, additional pressures on limited resources occur on the landscape, requiring intervention from federal land managers and others. The BLM is spending approximately \$75 million per year in monitoring, gathers, water hauls, and off-range holding and caring, which already house over 46,000 horses. Principally, the BLM manages, protects, and controls the wild horses and burros under the authority of the 1971 Wild Free-Roaming Horses and Burros Act. This law authorizes the BLM to remove excess wild horses and burros from the range and provides management tools to sustain the health and productivity on public lands. However, in recent years Congress has placed restrictions on the BLM through the appropriations process, exacerbating the effects of what has now become a crisis.

In comparison, when Nevada completed the 2014 Greater Sage-grouse Conservation Plan (State Plan) the estimated Western population of WH&B was 37,300. Nevada accounted for 24,000-26,500 WH&B, while the statewide AML is generally set at a little under 13,000. Not accounting for the foals produced in 2017 the estimated population of WH&B in Nevada is nearly 37,000. After having a very productive water year, it is probable that number could be increased by 20 percent to 44,600, nearly double what it was in 2014.

We encourage your careful consideration of the guidance that is offered within our State Plan as you consider alternatives for the future management of the WH&B populations in the West. Within Section 7.4 of our State Plan there are three Goals, with several associated Objectives, and Management Actions. These were developed using the available scientific literature as well as guidance from a science work group that was composed of biologists, rangeland ecologists, wild horse and burro specialists, and veterinarians. The Nevada Sagebrush Ecosystem Technical Team compiled this information for review and eventual approval by the Council. Please find attached to this letter a copy of that section as support to our request (Attachment 1).

The WH&B Advisory Board recently submitted a list of recommendations for the management of WH&B in the West. We support the implementation of those recommendations from the Advisory Board. A copy of these recommendations is also included in this letter (Attachment 2).

While some of the recommendations from the Advisory Board and Management Actions within our State Plan may involve developing methods and sciences for monitoring and management of WH&B, each repeatedly refer to the full implementation of the authorities granted in the 1971 Wild Free-Roaming Horses and Burros Act for the management of WH&B populations and maintenance of AML.

We appreciate your consideration of the recommendations and management actions included as attachments to this letter. As displayed, this issue has been long standing and is in need of urgent actions in order to: Avoid additional burdens to the taxpayers of the U.S.; Halt further degradation to the ecosystems; Ensure populations meet AML annually; Safeguard the multiple uses authorized by the public land management agencies; Protect wildlife and the resources they are dependent upon.

Sincerely,

J. J. Goicoechea  
Chairman  
Sagebrush Ecosystem Council