

14th April 2024

Dear Sagebrush Ecosystem Council,

Please include my Public Comment in Agenda #5 and in its entirety in the Meeting Minutes.

I am writing my public comment in protest to the Sagebrush Ecosystem Council endorsing and signing onto the Letter by the Coalition for Healthy Nevada Lands, Wildlife and Free-Roaming Horses.

Just over two weeks ago, on March 30, U.S. District Court Judge Randolph Moss for the District of Columbia, ruled that “although Congress vested the Bureau with broad discretion, it also took steps to ensure that the Bureau based its decisions on accurate information and **science**, rather than pressure from **interest groups** or guesswork.” This ruling followed just days after U.S. District Court Judge Miranda Du, Reno Nevada ruled that the BLM failed to adopt a legal herd management plan or conduct the necessary environmental reviews. In fact, the Judge noted that BLM’s lack of required studies has been “nothing short of egregious and clearly violates the rule of reason.” Two strong admonishments of BLM from two different judges in two different courts.

And yet despite these outside legal audits, the Sagebrush Ecosystem Council is in fact urging the BLM to seek more funding to conduct further roundups.

U.S. District Court Judge Randolph notes the need to use accurate “information and science”.

Two prominent, and most especially INDEPENDENT and unremunerated ecologists, Craig Downer - the Andean Tapir and Wild Horse Fund and Erik Molvar - Western Watersheds Project, who is a specialist in sage-grouse conservation, both testified that they categorically disputed the scientific evidence presented by the Sagebrush Ecosystem Council. It should be noted that these two ecologists have spent their lives working in the field.

U.S. District Court Judge Randolph also noted that “the Bureau must not be swayed by pressure from interest groups”.

Clearly when you look at the sign-ons for the Coalition Letter it reads like a list from a Western hunter's directory. What the Sagebrush Ecosystem Council

has failed to note however, is that the list of people opposing the Coalition Letter reads like a census of the general public – all voters and all tax-paying individuals. The public letters sent to the Advisory Board to Wildlife, Las Vegas in March alone accounted for over 150 individuals. (It should be noted that none of these letters were included in the Agenda and only a few in the Minutes). These were people who cared enough to write to the Chairman to express their outrage, and this disregard showed a clear failure of public transparency! Various entities spoke and were represented and if their collective members were all counted, then thousands of members of the public voiced their strong opposition to the Coalition letter. We are in possession of all these letters of opposition, and the 8 that supported it.

It turns out that only 5 of the 17 Advisory Boards to Wildlife agreed with the Sagebrush Ecosystem Council's decision. At the Nevada Board of Wildlife Commissioners Las Vegas meeting in March, the Chairman called for caution signing onto an entity of which they were not sure of. The Carson City Advisory Board to Manage Wildlife chose caution by taking no action, as did the Douglas County Advisory Board to Manage Wildlife's Chairman who noted that he had done a search on the Coalition and could not find enough pertinent information on the Group to warrant his trust. He said that the "lack of transparency was troublesome" and that "he found ONE single name" linked to the group "and it is a person who resides in Arizona.

Ultimately, one must question an endorsement of an unsigned Letter demanding such radical action by an entity that lacks transparency and is opposed by leading ecologists and the public at large.

Respectfully,

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