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STATE OF NEVADA

BOARD OF WILDLIFE COMMISSIONERS

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Governor

January 19, 2011

Mr. Ken Salazar, Secretary
U.S. Department of the Interior
1849 C Street, N.W.
Washington, DC 20240

Dear Secretary Salazar:

The Nevada Board of Wildlife Commissioners voted unanimously to express their opposition to the proposal of Mrs. Madeline Pickens to establish a "Sanctuary for Free and Wild Roaming Horses" in northeastern Nevada at their meeting of December 4, 2010.

The Nevada Board of Wildlife Commissioners must oppose this form of wild horse sanctuary until such time as all of the wildlife resource concerns are resolved, including:

1. Specify how a "thriving ecological balance" of horse numbers and management will be identified. A horse herd in thriving ecological balance by definition includes numbers that are sustained by the most limiting factors of habitat such as seasonal forage availability. Thriving ecological balance also means that any measure of detrimental effects on habitat attributes of any wildlife species are prohibited with specific analysis of the effects on species such as the spotted frog or other protected wildlife.
2. Federally administered lands within this area must remain open for public access on a multiple use basis including recreation, hunting, and other federal land use purposes.
3. Federally administered lands within this area must remain open for access for enforcement of wildlife laws, access for wildlife surveys and all other management including access by the public for wildlife harvest.
4. Objectively analyze the potential to return cattle and domestic sheep grazing

- to the area given the historic and commercial data indicating that domestic livestock grazing is necessary to restore wildlife habitat including watershed values and water yield. Complete such analysis to compare livestock grazing both with and without horses in those allotments.
5. Fully account for losses to the State and local custom, culture, and economies that will result from wildlife numbers declining, and livestock being removed from the rangelands.
 6. Verify that every action will be in compliance with Nevada law.
 7. Complete a technically sound Inventory of the existing conditions within the entire proposed wild horse sanctuary area utilizing scientifically sound and proven techniques. Most of those techniques will be repeated in the future as monitoring.
 8. In accordance with federal law, completely identify the research needs that will come to light during a properly conducted scoping process, and complete that research before any horses are released into the area.
 9. Complete an Environmental Impact Statement in strict accordance with the National Environmental Policy Act (NEPA).

On behalf of the Commission, I request that you prevent this project from going forward. We appreciate your consideration of this matter and look forward to hearing from you.

Sincerely,

Scott Raine
Chairman
Nevada Board of Wildlife Commissioners