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Nevada Board of Wildlife Commissioners
C/O August 14, 2009 meeting, Elko, NV

Subj: Explanation of CAB position, Agenda Item 6, Wine Cup Ranch, Lyon CABMW

Dear Commissioners;

It is not the intent of the Lyon CABMW to impede the Federal government's efforts to reduce costs associated with its horse program, nor to dictate the uses of any private property by its owners and tenants. However the impacts to wildlife in any region can be felt beyond the boundaries of any given piece of property. As such, "sanctuary" and alternative range projects should be viewed from the broadest practical standpoint.

The Lyon CABMW recognizes that under current law BLM is authorized to enter into agreements with private landowners for holding horses (16 U.S.C. § 1336.) However the Wine Cup Ranch proposal brings to light important issues that must be addressed when introducing large numbers of horses, or any other new species, into an area where they have not recently existed. We feel that the BLM has the moral imperative, if not the legal obligation, to consider the same issues with respect to private property projects as it should be considering on sensitive public lands.

To date the Lyon CABMW has not received any documentation or other evidence that the following issues have been adequately addressed.

1. A valid assessment regarding the impacts of an introduced population of horses to the current ecological balance, and the effects on limited water sources, riparian areas, sensitive plant colonies and in particular, competing ungulant wildlife.
2. A management plan that preserves a thriving balance of the wildlife that inhabit, or migrate across, the properties being considered for horses.
3. A population control plan that recognizes the need for any population of horses to be managed so that they remain as a balanced component in a thriving ecological ecosystem; a condition that is imperative to the health and well being of all animal and plant species, including horses. Such a plan must include practical methodologies for maintaining horse populations within these balanced limits.
4. A resource management plan that recognizes that without sufficient and appropriate resources, all animals within any defined area will have to more aggressively compete as resources become more limited, and that such competition can result in environmental damage as well as loss of less competitive animal species. Such a plan must include the application of established scientific methods for monitoring and evaluating resource

conditions, and specific practical plans for developing necessary resources and mitigating resource damage caused by additional animals being introduced into the ecosystem.

5. An estray plan that will reasonably ensure that horses will be contained within the sanctuary area and will not inadvertently spawn feral populations in areas where horses are not intended to range.
6. Some explanation as to which entity will be accountable for the effects and impacts of such a project.

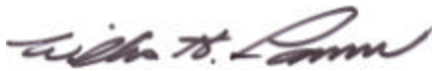
The Lyon CABMW would prefer that such an experiment be conducted in a region where horse populations presently exist, or have recently existed, and the impacts of their presence on resources and wildlife are more clearly understood. Considering the history of BLM's horse program, some mistakes are expected as BLM's horse relocation efforts get underway, and we fear that a rush to save costs through relocations could come at the expense of preserving thriving habitats.

Ironically, S.1579 would require the Secretary of Interior to "assess the effects of sanctuaries or exclusive use areas for wild free-roaming horses and burros on rangeland health, riparian zones, water quality, soil compaction, seed bed disturbance, native wildlife, and endangered or threatened species," and this requirement is specifically extended to agreements with private landowners. However since current law permits agreements without these specific protections, the real problem may involve efforts by BLM to enter into agreements with private landowners during a time when consideration of these conditions is not mandatory.

There is clearly a well-organized effort to maintain horse herds in Nevada. Even those interest groups that advocate for the continued presence of these animals should appreciate the importance of maintaining thriving and balanced habitat for horses and wildlife alike. Whether the advocates are sportsmen, ecologists, wildlife enthusiasts or horse enthusiasts, if we all don't advocate to adopt management priorities that preserve sustainable thriving habitats, what's the point?

Congress declared Wild Free-Roaming Horses and Burros to be a component of our public lands, not the predominant element on our public lands. We need to reach a point where the preservation of healthy public lands becomes the predominant objective, and the presence and management strategies for all animals on those lands are designed to achieve, rather than defeat, that objective. It is to all our interests to keep the dialogue focused on the very fundamental issues of healthy rangelands and thriving ecological balance, and making management decisions that are appropriate for the areas in which the impacts of such decisions will be felt.

Respectfully Submitted,



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Lyon CABMW