

Dear Secretary Salazar:

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I am writing to express The Nevada Board of Wildlife Commissioner's opposition regarding the proposal to convert use of the Winecup/Gamble Ranch grazing allotments to a wild horse sanctuary. Since this proposal was made public with the initial participation of Mrs. Madeline Pickens, and now on behalf of the Ranch, my agency has brought to light concerns regarding the anticipated impact to wildlife on public lands. The Winecup-Gamble Ranch allotments total nearly 1 million acres of which 750,000 acres are public lands providing significant productive wildlife habitat.

This area currently supports a wide range of wildlife species including: Mule deer, elk, pronghorn antelope and sage grouse (to mention a few) which would be impacted by its conversion to wild horse use. Competition would be expected for both forage, available water and space. Over two-thirds of the allotments are comprised of sagebrush vegetated communities, which as you are aware, are disappearing at an alarming rate due to wildfire impacts and replacement by noxious/invasive weeds.

Impacts expected to sagebrush ecosystems from horse presence (as identified in Environmental Assessment Beever et al (2008) include: Soil compaction from trampling, a decrease in overall plant cover and species diversity, and an increase in cheatgrass (and other invasive weedy species) presence. These effects can have negative implications to rodents and ants which results in a decrease of plant density and diversity through a depression of seed dispersal and germination, a decrease in shrub density (from trampling and

rubbing) which has been shown to be a primary factor influencing sage grouse nesting success. Beever et al (2008) go on to mention that “horses may be considered ecologically part of a novel disturbance regime rather than as a native species”. The plants did not evolve with the horse and as such horses are not a part of the naturally thriving ecosystem.

From a legal perspective, there is currently no horse use approved and no herd management areas on these allotments. Introduction of wild horses and conversion of this public land for wild horse use is felt by this Commission to be inconsistent with the intent of the Wild Free-Roaming Horse and Burro Act of 1971 and inconsistent with the current Bureau of Land Management Resource Management Plan.

Wild horse populations in a condition of unrestricted breeding and reproduction are of great concern. This less than sufficiently managed situation results in a doubling of the population in four years. This increase will quickly lead to overpopulation and severe competition for forage and water unless strict population control through some form of contraception or sterilization is practiced. Those concerns are even greater when the management is not under the direction of a governmental entity. These captive herds would then face the same problems now being experienced in herd management areas, requiring roundups and relocation/adoption to ensure that wildlife resources are not negatively impacted.

While we would applaud the concept of a sterile, zero growth herd, introduction of such large numbers (10,000 plus) of wild horses into any area not

currently experiencing that impact would be devastating to the wildlife present. Horses are super competitors and have been know to prevent access to water by wildlife and to decimate forage and cover availability in the vicinity of the localized areas they frequent, even in free roaming conditions with far fewer numbers.

This Commission requests that you oppose this change of use and support state efforts in assuring stable and healthy habitat conditions for Nevada wildlife resources. If you have any questions or would like additional information regarding our concerns, please feel free to contact me. Thank you for your consideration.

Sincerely,

Dr. Gerald A. Lent, O.D.
Chairman

Literature cited

E.A. Beever, Robin Tausch and Wayne Thogmartin (2008) "Multi-scale responses of vegetation to removal of horse grazing from Great Basin (USA) mountain ranges"
Plant Ecology (2008) 196:163-184.

**WILDLIFE HABITAT LOCATED ON THE GRAZING ALLOTMENTS
OF THE WINECUP-GAMBLE RANCH, ELKO COUNTY, NEVADA**

Total Acres of Allotments: 950420 acres

Mule Deer Habitat	Acres	Pronghorn Antelope Habitat	Acres
Crucial Movement	61541	Crucial Winter	8869
Crucial Summer	16276	Summer Range	546611
Crucial Winter	2375	Winter Range	36291
Low-density	495148	Year-round	186224
Summer Range	96884		
Transition Range	13876		
Winter Range	204563		

Elk Habitat	Acres	Greater Sage-Grouse Habitat	Acres
Crucial Summer	70882	Core Breeding	234860
Crucial Winter	127955	Nesting/Early Brood Rearing	197634
Low-density	202137	Summer/Brood Rearing	754820
Summer Range	22248	Winter	458256
Winter Range	127187		
Year-round	724294		

Sagebrush Habitat: 666164 acres

Wildlife habitat types are not necessarily mutually exclusive. Data derived from NDOW biologist field data and GIS analysis. Sagebrush habitat data derived from USGS Southwest Regional GAP landcover analysis and includes the following ecolog

- Great Basin Xeric Mixed Sagebrush Shrubland
- Inter-Mountain Basins Big Sagebrush Shrubland
- Inter-Mountain Basins Big Sagebrush Steppe
- Inter-Mountain Basins Montane Sagebrush Steppe