



JIM GIBBONS
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July 27, 2007

Gerald M. Smith, Field Manager
DOI Bureau of Land Management
Battle Mountain Field Office
50 Bastian Road
Battle Mountain NV 89820

Steve Williams, District Ranger
USDA Forest Service
Austin-Tonopah Ranger District
PO Box 130 – 100 Midas Road
Austin NV 89310

Dear Mr. Williams & Mr. Smith:

The Nevada Board of Wildlife Commissioners (NBWC) would like to focus attention on the ongoing struggle to attain management control of feral horse and burro populations in Nevada. The NBWC supports planned management objectives and actions to reduce the number of horses and burros on Nevada Herd Management Areas (HMAs) and Wild Horse Territories (WHTs) to Appropriate Management Level (AML). Feral horse and burro populations living on federal lands outside of HMA's or WHT's should also be removed. The NBWC supports adequate funding to the federal land management agencies in Nevada to accomplish these objectives.

Our concerns are well illustrated by the current feral horse populations in the Mt. Jefferson area in northern Nye County. Credible sources report as many as 150 horses in this area on both FS as well as BLM lands. This area contains critical mule deer habitat as well as winter range for one of the best bighorn sheep populations in Nevada. The competition for limited resources between wildlife, cattle and feral horses is causing significant problems for Nevada's ranchers and sportsmen.

We are aware of the Toquima WHT administered by the Forest Service and encourage a quick resolution to setting AML and reducing horse populations accordingly. Sportsmen are concerned enough to offer their assistance in bringing the excessive horse population to a quick resolution to prevent further environmental damage.

We are unaware of any adjacent HMAs administered by the BLM which leads to our concern for the management of horse or burro populations outside of designated HMAs or WHTs. What steps and/or cooperative efforts between federal agencies need to occur or are occurring to manage horse and burro populations beyond the designated HMAs and WHTs?

The existence of feral horses and burros in Nevada above AML and beyond management boundaries has decreased the amount of habitat and forage available for wildlife and domestic livestock. The continuing overpopulation of feral horses jeopardizes the long term viability of wildlife populations and ranching in Nevada. A recurring threat of drought and increasing losses to wildfire are exacerbating the impacts of horse populations. With the resultant poor rangeland conditions occurring over much of the state, it is imperative to relieve the stress to public lands associated with horse and burro populations in excess of AML, as well as to reassess current AMLs relative to existing rangeland conditions.

Great Basin ecosystems are recognized as fragile habitats at great risk from wildfire, invasive species, overuse, drought, etc. This fragile nature emphasizes the importance of managing horse and burro populations in a thriving ecological balance. The NBWC would further like to emphasize the requirement under the Wild Free-Roaming Horse and Burro Act of 1971 for the consultation with the State Wildlife Management Agency in the determination of an AML consistent with achieving a natural ecological balance.

The DOI Bureau of Land Management and the USDA Forest Service appear to be making progress toward their goals in managing wild horse and burro populations in a thriving natural ecological balance with wildlife and domestic livestock in Nevada. The Wildlife Commission and sportsmen of Nevada would like to begin a dialog with your agencies regarding feral horse and burro management. Thank you for your consideration.

Sincerely,

Clint Bentley
Vice Chairman

cc: Mr. Ron Wenker, Nevada BLM Director
Mr. Ed Monnig, Humboldt-Toiyabe Forest Supervisor
The Honorable Harry Reid
The Honorable John Ensign
Governor Jim Gibbons
Kenneth Mayer, Secretary for the Commission