

Date:

From: Coalition for Healthy Nevada Lands, Wildlife, and Free Roaming Horses
Rebekah Stetson, Chairwoman

Subject: Support for BLM's Proposed Wild Horse Management Proposal

The Coalition for Healthy Lands, Wildlife, and Free Roaming Horses appreciates BLM's recognition that free-roaming horses and burros (FRHB) impact wildlife, plants and pollinators. We are a coalition of passionate Nevadans composed of members of conservation organizations, natural resource professionals, and concerned individuals. We are dedicated to creating and implementing change as together we recognize that our FRHB populations are having not only a major impact on their habitat, but also on Nevada's wildlife and natural landscapes. In its newly released [*Report to Congress: An Analysis of Achieving A Sustainable Wild Horse and Burro Program*](#), BLM proposes a multi-method approach and a multi-million dollar program to reduce FRHB populations to sustainable levels over the next twenty years. While the Coalition supports the goals of the Report, we are concerned that it is not sufficiently urgent to meet objectives before more damage occurs to wildlife and horse and burro habitat.

The BLM proposed expense is quite a hefty price tag and we believe it is more than justified, in fact, essential. Here is why:

Nevada is home to over 50% of all FRHB on BLM lands in the United States. In Nevada, the FRHB population numbers have exceeded land health capacity for decades. For Nevada, BLM set a biologically based horse and burro population number for land health sustainability at approximately 13,000 FRHB. Currently in Nevada, those numbers are at 52,000 on BLM lands, with another 10-12,000 residing on Forest Service, military, tribal, and state lands—over 6 times what our lands can sustain! To put horse and burro numbers in perspective, the biomass of FRHB is nearly double of that of all antelope, mule deer, bighorn sheep, and elk, combined in Nevada. Without BLM implementing an aggressive horse and burro population reduction program, the number of FRHB will double in the next 4-5 years to over 100,000 in Nevada alone. Without BLM taking immediate action, the status quo represents an ever-increasing crisis, which will grow more difficult and expensive over time. We all must step up to aid and empower the BLM to implement immediate action.

The Coalition recognizes that FRHB are part of the multiple-use fabric of our public lands and we all enjoy seeing them. A drying climate and increasing fires bring a changing plant composition to our fragile Great Basin, less favorable to foraging ungulates that include FRHB. At the same time, we realize that Nevada will likely continue to host over half of BLM's wild horse and burro population. However, we do not wish to witness the continued decline of our public land sustainability caused in large part by the current excessive horse and burro populations. This is a direct impact to Nevada's wildlife and wildlife habitat. Without proper management, the FRHB will increasingly either starve or die of thirst, a heart wrenching atrocity to us all.

The costs to manage horse and burro numbers are now much higher because of complexities that are inhibiting adequate management. Over the past decades this inadequate management has left excess FRHB on the range to breed and expand their population. BLM anticipates these costs to increase from \$80 million per year in 2020 to

\$116,819,000 in the first year of program implementation and to \$238,000,000 by year five. The reduction in horse populations presumes that off-range pastures will be leased, adoptions will increase, and long-term fertility control will be administered. This cost, as the report indicates, does not include fertility control research. Only with long-term population control of FRHB on public lands can the program ultimately minimize costs and be successful. The expense of both long- and short-term holding sites, implementing timely gathers, and utilizing long-term effective fertility controls, will continue to exponentially increase if aggressive action is not taken now. Our state and nation must act quickly or the economic and ecological costs will continue to escalate, with long-term consequences for our wildlife and ultimately for FRHB.

We support BLM's recognition of the increasingly negative impact of a program that has not been adequately funded, implemented nor publicly supported. BLM's determination to proactively address this issue is a laudable step toward restoring the health of our public lands. We urge swift approval of increased funding for this program by Congress. Because Nevada has over 50% of all BLM FRHB, we urge that commensurate funds and efforts be expended in Nevada. The Coalition will enthusiastically work with BLM, USFS, and other interest groups to implement a successful program and to ensure that the sustainability of Nevada's lands are enhanced and preserved.

We understand that the issues brought forth in this letter are complex. We are here to help create awareness, educate and create solutions together. Please reach out with any questions or comments. Thank you for all that you do to support our beautiful state of Nevada!

In gratitude and reverence,
Rebekah

Rebekah Stetson
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