

**CABMW Recommendations for the January 2022 Wildlife Commission Meeting**  
(Month/year)

**Lincoln County Advisory Board to Manage Wildlife meeting results**

**Submitted by Chairman: Cory Lytle**

To the Wildlife Commission, c/o Executive Assistant to Director Brandy D. Arroyo [bdarroyo@ndow.org](mailto:bdarroyo@ndow.org)

**CABMW Members Present:** C. Lytle, D. Bradfield, G. Rowe, J. Tibbetts, J. Condie **NDOW:** D. Sallee,  
**Others in Attendance:** K. Teel, R. Rowe, D. Bradfield, M. Holt,

**Commission Agenda Action Items**

**1) Agenda item : Commission Policy 1, General Guidelines, Second Reading.**

**Recommendation**

In Support X In Opposition \_\_\_\_\_ See comment below \_\_\_\_\_

Other comments, including a dissenting viewpoint (different than the majority) or issue brought up during discussion:

**2) Agenda item : Commission Policy 10, Heritage Tags and Vendors, Second Reading.**

**Recommendation**

In Support X In Opposition \_\_\_\_\_ See comment below \_\_\_\_\_

Other comments, including a dissenting viewpoint (different than the majority) or issue brought up during discussion:

**3) Agenda item : Commission Policy 33, Fisheries Management Program, First Reading.**

**Recommendation**

In Support X In Opposition \_\_\_\_\_ See comment below \_\_\_\_\_

Other comments, including a dissenting viewpoint (different than the majority) or issue brought up during discussion:

**4) Agenda item : Commission Policy 64, Input on Land Sales, etc, First Reading.**

**Recommendation**

In Support X In Opposition \_\_\_\_\_ See comment below \_\_\_\_\_

Other comments, including a dissenting viewpoint (different than the majority) or issue brought up during discussion:

5) **Agenda item : Commission Policy 67 Federal Horses and Burros, First Reading.**

**Recommendation**

In Support ☐ In Opposition ☐ See comment below X

Other comments, including a dissenting viewpoint (different than the majority) or issue brought up during discussion:

**The Lincoln CAB Comments regarding proposed Policy 67**

The Lincoln CAB believes the language in Policy 67 should convey a much stronger and more forceful message regarding the Horse and Burro management debacle.

It can be easily argued that the unmanaged overpopulation of feral horses and burros serves as the greatest threat facing Nevada's wildlife. The resulting mismanagement of FRHB and the impacts to Nevada's rangelands and water resources is simply devastating.

**Policy Section 1:** Please change "pose a problem," to language that more accurately describes the dire situation relative to the current state of Nevada's Wildlife and habitat. We recommend, "are disastrous," or "very real and serious threat." Words are difficult to truly describe how terrible the situation across our State is.

**Policy Section 3:** While its understandable to support the "path forward," the 20-year time frame to reach AML is unrealistic, at best. It should be stated that the shorter timeframe is strongly supported with the inclusion of mandatory funding for continuous gathers and resources to accommodate the gathers and removal/relocation.

**Policy Section 7:** The NDOW biologists are a great resource to gather data regarding herd numbers. The policy should include other important wildlife species such as Mule Deer. *Certain fawning areas have become completely void of understory due to overuse by horses, and are a primary cause of fawn mortality; as they are more easily detected by predators.* Additionally, the policy references gathers both within HMAs and outside the HMAs. As with the BLM Ely District, some of the areas outside of designated HMAs were historically "horse herd areas." These areas were dropped in updated resource management plans. The Management Action regarding dropped herd areas calls for removal of horses in these areas because those areas did not provide sufficient habitat resources to sustain healthy populations. (*BLM Ely District RMP, 2008 P. 47*) Many areas outside of designated HMAs are completely overrun with horses and have simply been ignored.

We all know the only realistic management tool to reach AML is through lethal control. The scientific and realistic path toward "humane management" should include certain lethal control methods. The true intention of the 1971 WFRHB Act was to maintain a balance. We owe it to ourselves and future generations to maintain the balance. Ignoring common sense sound scientific approaches and catering to uneducated emotional and social influences will guarantee the continued degradation and of our rangeland and habitat. The current and continuing result is substantial negative impacts to ALL of Nevada's wildlife and the FRHB themselves. Left unmanaged, these "symbols of the historic and pioneer spirit of the west," will simply destroy our State.

-see attached information.

6) **Agenda item : CGR 504- E-Tag Regulation.**

**Recommendation**

In Support   X   In Opposition        See comment below       

Other comments, including a dissenting viewpoint (different than the majority) or issue brought up during discussion:

7) **Agenda item : CR 21-07 Amendment #2, 2022 Heritage Tag BHS Unit Closures.**

**Recommendation**

In Support        In Opposition   X   See comment below       

Other comments, including a dissenting viewpoint (different than the majority) or issue brought up during discussion:

**The Lincoln CAB supports keeping the Heritage BHS consistent with other Heritage restrictions.**

8) **Agenda item : CR 22-01 2022 Big Game Application Deadlines.**

**Recommendation**

In Support   X   In Opposition        See comment below       

Other comments, including a dissenting viewpoint (different than the majority) or issue brought up during discussion:

9) **Agenda item : CCR 22-02 2022 Big Game Application Eligibility and Tag Limits.**

**Recommendation**

In Support   X   In Opposition        See comment below       

Other comments, including a dissenting viewpoint (different than the majority) or issue brought up during discussion:

10) **Agenda item : CR 22-03 2022 Dream Tag.**

**Recommendation**

In Support   X   In Opposition        See comment below

Other comments, including a dissenting viewpoint (different than the majority) or issue brought up during discussion:

**11) Agenda item : CR 22-04 2022 PIW Tags.**

**Recommendation**

In Support   X   In Opposition        See comment below       

Other comments, including a dissenting viewpoint (different than the majority) or issue brought up during discussion:

**12) Agenda item : CR 22-05 2023 Heritage Tag Seasons and Quota.**

**Recommendation**

In Support     In Opposition   X   See comment below   X  

Other comments, including a dissenting viewpoint (different than the majority) or issue brought up during discussion:

**The Lincoln CAB supports an August 1 start date for Sheep to coincide with the camera regulation.**

**13) Agenda item : CR 22-06 2022 Silver State Seasons and Quota.**

**Recommendation**

In Support     In Opposition   X   See comment below   X  

Other comments, including a dissenting viewpoint (different than the majority) or issue brought up during discussion:

**The Lincoln CAB supports an August 1 start date for Sheep to coincide with the camera regulation.**

**14) Agenda item : CR 21-03 Amendment 1, 2022-23 Big Game Seasons.**

**Recommendation**

In Support   X   In Opposition        See comment below       

Other comments, including a dissenting viewpoint (different than the majority) or issue brought up during discussion:

**15) Agenda item : CR 22-09 Black Bear Seasons.**

**Recommendation**

In Support ☒ In Opposition ☐ See comment below ☐

Other comments, including a dissenting viewpoint (different than the majority) or issue brought up during discussion:

**16) Agenda item : CR 22-08 Mountain Lion Seasons and Harvest Limits.**

**Recommendation**

In Support ☒ In Opposition ☐ See comment below ☐

Other comments, including a dissenting viewpoint (different than the majority) or issue brought up during discussion:

**17) Agenda item : CR 22-07 2022-23 Restricted NR Guided Mule Deer Seasons and Quotas.**

**Recommendation**

In Support ☒ In Opposition ☐ See comment below ☐

Other comments, including a dissenting viewpoint (different than the majority) or issue brought up during discussion:

**18) Agenda item : Draft FY 2023 Predation Management Plan.**

**Recommendation**

In Support ☐ In Opposition ☐ See comment below ☒

Other comments, including a dissenting viewpoint (different than the majority) or issue brought up during discussion:

**No Action.**

**19) Agenda item : Mule Deer Enhancement Program Update.**

**Recommendation**

In Support ☐ In Opposition ☐ See comment below ☒

Other comments, including a dissenting viewpoint (different than the majority) or issue brought up during discussion:

**Updates given on MDEP.**

**20) Agenda item : NBWC Agenda Items not covered.**

**Recommendation**

In Support ☐ In Opposition ☐ See comment below ☒

Other comments, including a dissenting viewpoint (different than the majority) or issue brought up during discussion:

No Action.



Mule Deer  
Working Group

# Fact Sheet

## MULE DEER AND WILD/FERAL HORSES AND BURROS

### Fact Sheet #29

#### OVERVIEW

Horses and burros managed by the Bureau of Land Management (BLM) and U.S. Forest Service (USFS) are classified as "wild." Horses and burros that exist on lands managed by other Federal, state, tribal, or other jurisdictions are considered "feral." Both wild and feral horses and burros are considered here. Current numbers of wild horses and burros on BLM and USFS lands exceed their established Appropriate Management Levels (AML) by more than 300%. This is unsustainable and does not conform to the goal of the Wild Free-Roaming Horses and Burros Act of 1971 (Act) to achieve and maintain a "thriving natural ecological balance." If the exponential population growth rates of both wild and feral horses and burros continue, it will likely result in a disastrous collapse of forage and water resources within fragile desert and sagebrush environments and associated native fish and wildlife populations including mule deer and the horses and burros themselves.



Photo: Brett Blum

#### BACKGROUND

Over the past three decades mule deer populations have struggled and many have declined, while thriving wild/feral horses and burros continue to increase. It is well-established that mule deer, especially struggling populations, cannot persist with more environmental stressors to contend with. Mule deer and wild/feral horses and burros inhabit many of the same environments from the deserts to the sagebrush steppe to the mountains throughout the West. In some jurisdictions, wild/feral horses and burros have greatly expanded their presence in prime mule deer habitats. Wild/feral horses and burros alter important habitats (some permanently). They also compete directly with mule deer and other wildlife for forage, water, and cover, often defending these resources against use by wildlife. Reducing competition from unregulated wild/feral horse and burro populations would enhance mule deer population health and vigor in the habitats they share.

#### ISSUES

The original intent of the Act was to humanely protect free-roaming horses and burros with sound, science-based natural resource management in order to protect the natural ecological balance of all native fish and wildlife and their habitats. Ignoring science and heeding to emotionally-charged opinion is contrary to the intent of the Act. This has resulted in severely degraded natural resources and the inability of some environments (i.e., deserts) to sustain the continually increasing horse and burro populations much less the native wildlife endemic to these areas. In short, wild/feral horses and burros are literally destroying the habitat they and native wildlife depend on. Recently, research has documented wild/feral horses displacing native wildlife (mammals, birds and reptiles) from drinking at critical water sources in the Great Basin Desert.



Photo: Sarah Noelle

It is also widely documented that wild/feral horses severely reduce native wildlife species richness and diversity and detrimentally impact sagebrush habitats and associated sage-grouse populations. Sagebrush habitats in these same environments are important to mule deer, particularly during winter.

## MANAGING FOR FEWER WILD HORSES AND BURROS

The BLM and USFS are responsible for wild horse and burro management on federally-owned public lands as "living symbols of the historic and pioneer spirit of the West." The Act requires management plans to "preserve and maintain a thriving natural ecological balance and multiple-use relationship in that area and to protect the range from the deterioration associated with overpopulation."

The National Academy of Sciences in 2013 stated "Evidence suggests that wild horse and burro populations are growing by 15 to 20 percent each year, a level that is unsustainable for maintaining healthy populations as well as healthy ecosystems." In March 2018, BLM estimated 82,000 wild horses and burros on public rangelands yet the AML is less than 27,000, and nearly an additional 50,000 wild horses and burros are in holding facilities. The cost of BLM's Wild Horse and Burro Program has risen from \$36.2 million in 2008 to \$80.4 million in 2017, with most being spent on care of excess animals in off-range facilities.

The removal of prohibitive budget appropriations language would allow the Wild Horse and Burro Program to be more effective in reducing horse and burro numbers to established AMLs thereby ensuring healthy rangelands and maintenance or restoration of crucial wildlife habitats. It is also important BLM and USFS be given the ability to use all management tools provided by the Act. State wildlife management agencies, other jurisdictions, and wildlife conservation groups must engage at the state and local levels to support the Federal agencies' efforts to manage horses and burros at their AMLs.



Photo: Sarah Noelle

Photo: Alan Shepherd



Photo: Sarah Noelle

## IN SUMMARY

Management of wild/feral horses and burros is a deeply emotional and divisive issue. Animal over-population and excessive use of rangeland resources is at the focus of this national crisis. Today, rangelands throughout much of the West are not capable of sustaining wild/feral horses and burros at their current levels, thus diminishing the value of those habitats for mule deer and other wildlife. As with other resource management issues there is opportunity to balance the concerns and ideologies of people with ecological constraints of the habitats important to mule deer and other wildlife. As a Nation, we must urgently strive to find that balance and permit proper wild/feral horse and burro management.

**More information on Mule Deer can be found at [www.muledeerworkinggroup.com](http://www.muledeerworkinggroup.com)**

*A product of the Mule Deer Working Group - Sponsored by the Western Association of Fish & Wildlife Agencies. - Approved January 2019*

*Produced with support from the Mule Deer Foundation • [www.muledeer.org](http://www.muledeer.org)*



## **Ely District Approved Resource Management Plan**

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intensive research projects or passive population inventories designed to help identify the extent of the populations and habitats being used. Inventories for special status species will be completed within the planning area and information will be used to measure the effectiveness in meeting management objectives on a landscape level and watershed basis.

### **Wild Horses**

The Wild Free-Roaming Horse and Burro Act of 1971 (Public Law 92-195) requires the BLM to protect and manage wild horses in areas where they were found at the time of the Act, in a manner designed to achieve and maintain a thriving natural ecological balance in keeping with the multiple use management concept of public lands. These requirements are further detailed in the Standards and Guidelines for Wild Horses and Burros developed by the Northeastern Great Basin Resource Advisory Council and the Mojave/Southern Great Basin Resource Advisory Council.

#### ***Goals – Wild Horses***

Maintain and manage healthy, self-sustaining wild horse herds inside herd management areas within appropriate management levels to ensure a thriving natural ecological balance while preserving a multiple-use relationship with other uses and resources.

**Northeastern Great Basin Resource Advisory Council Standard.** Healthy wild horse and burro populations exhibit characteristics of healthy, productive, and diverse population. Age structure and sex ratios are appropriate to maintain the long-term viability of the population as a distinct group. Herd management areas are able to provide suitable feed, water, cover and living space for wild horses and burros and maintain historic patterns of habitat use.

**Mojave-Southern Great Basin Resource Advisory Council Standard.** Wild horses and burros within herd management areas should be managed for herd viability and sustainability. Herd management areas should be managed to maintain a healthy ecological balance among wild horse and/or burro populations, wildlife, livestock, and vegetation.

#### ***Objectives – Wild Horses***

To maintain wild horse herds at appropriate management levels within herd management areas where sufficient habitat resources exist to sustain healthy populations at those levels.

Herds will consist of healthy animals that exhibit diverse age structure, good conformation, and any characteristics unique to the specific herd.

**Management Actions – Wild Horses**

**General Wild Horse Management**

**WH-1:** Do not authorize domestic horse grazing permits within wild horse herd management areas (see **Map 9**).

**WH-2:** Coordinate wild horse management with other federal and state jurisdictions and resource management agencies.

**WH-3:** Do not construct permanent fences that prohibit the free-roaming behavior of wild horses or prevent wild horses from moving within herd management areas. Remove existing fences within herd management areas that restrict the free-roaming behavior of wild horses.

**Parameter – Herd Management Area Establishment**

**WH-4:** Manage wild horses within six herd management areas designated from herd areas (see **Map 9**) based on wild horse use and habitat suitability listed in **Table 12** covering approximately 3.7 million acres.

**Table 12**  
**Herd Management Areas**

<b>Herd Management Areas</b>	<b>Size Acres</b>	<b>Initial Appropriate Management Level</b>
Pancake	855,000	240-493
Triple B	1,225,000	250-518
Antelope	331,000	150-324
Silver King	606,000	60-128
Eagle	670,000	100-210
Diamond Hills South <sup>1</sup>	19,000	10-22
	<b>3,705,000</b>	<b>810-1,695</b>

<sup>1</sup> Managed as a complex with Elko and Battle Mountain BLM.

**WH-5:** Remove wild horses and drop herd management area status for those areas that do not provide sufficient habitat resources to sustain healthy populations as listed in **Table 13**.

**Parameter – Population Management**

**WH-6:** Initially manage the appropriate management level as a range between 810 and 1,695 animals on all herd management areas within the planning area. Manage populations within ranges of appropriate management levels in which the upper level is based on available habitat and the lower level is based on the projected recruitment rate between gather cycles as developed from herd monitoring data (see **Table 12**).

**Table 13**  
**Herd Management Areas Dropped**

<b>Herd Management Areas</b>	<b>Public Land Area (acres)<sup>1</sup></b>
Antelope (west of Highway 93)	62,900
Applewhite	30,300
Blue Nose Peak	84,600
Cherry Creek (eastern portion)	3,200
Clover Creek	33,100
Clover Mountains	168,000
Delamar Mountains	183,600
Highland Peak (southern 2/3)	65,500
Jakes Wash	153,700
Little Mountain	53,000
Meadow Valley Mountains	94,500
Miller Flat	89,400
Moriah	53,300
Rattlesnake (southern 1/2)	37,400
Seaman	358,800
White River	116,300
<b>Totals</b>	<b>1,587,600</b>

<sup>1</sup> Rounded to hundreds.

**WH-7:** Base adjustments to appropriate management levels on monitoring data and perform adjustments typically, but not exclusively, in conjunction with the watershed analysis process.

**WH-8:** Manage sex ratios, phenotypic traits, reproductive cycles, and other population dynamics on a herd management area basis.

**WH-9:** Implement the following management actions for desert tortoise habitat (also refer to the discussion on Special Status Species). The Ely District Office does not plan to manage for any wild horses in desert tortoise habitat and this management only will be used if emergency gathers are needed in the future should wild horses reenter the area.

- For gathers: Trap sites should be located at previous trap site locations or in previously disturbed areas, where possible. All trap and holding sites, and access routes will be cleared by a qualified tortoise biologist before the trap and holding facilities are set up. The parcel will be surveyed for desert tortoise using survey techniques that provide 100 percent coverage.
- For gathers: Holding facilities will not be located inside ACECs. If possible, they should be located outside of desert tortoise habitat. If they cannot be located outside of desert tortoise habitat, they should be placed in previously disturbed areas.

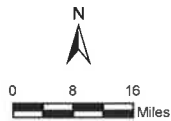
# Ely District RMP HMA's - Approved

## Regional View



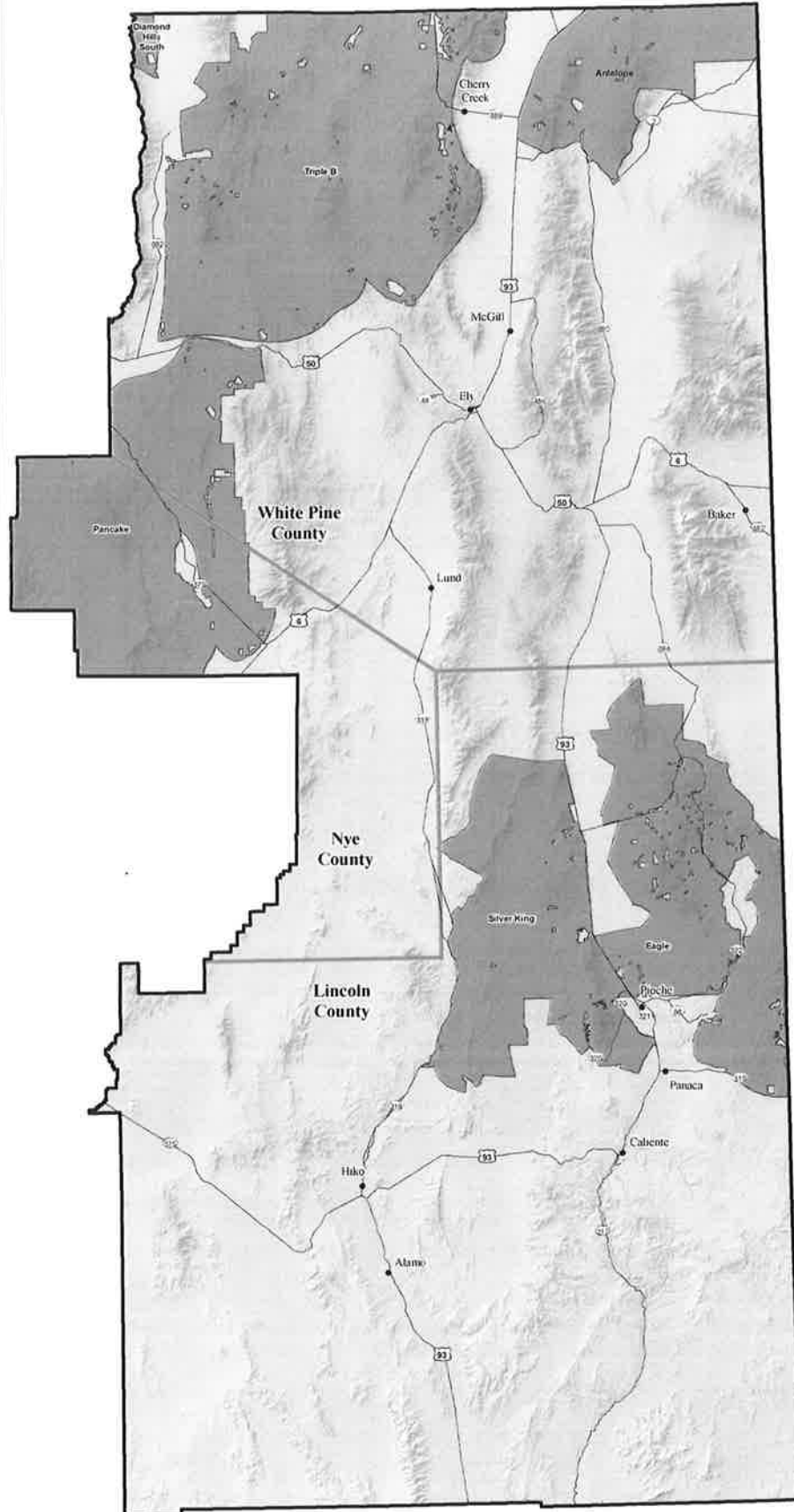
## Legend

- Cities and towns
- Roads
- County boundary
- Wild horse herd management areas



No warranty is made by the Bureau of Land Management as to the accuracy, reliability, or completeness of these data for individual or aggregate use with other data. Original data were compiled from various sources. This information may not meet National Map Accuracy Standards. This product was developed through digital means and may be updated without notification.

Ely RMP/ELS  
Wild Horse Herd  
Management Areas  
Proposed RMP and  
Alternatives B and C  
Map 2.4.8-2



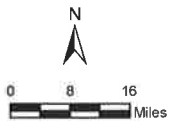
# Ely District RMP "HERD AREAS" DROPPED

## Regional View



## Legend

- Cities and towns
- Roads
- County boundary
- Wild horse herd areas



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Ely RMP/ELS  
Map 2.4-8-1  
Wild Horse  
Herd Areas

