



National Wild Horse and Burro Advisory Board Meeting
Reno, NV
June 28-30, 2023

The Nevada Chapter of the Wildlife Society thanks the Advisory Board for the opportunity to provide written comments. The Nevada Chapter, an affiliate of The Wildlife Society and the Western Section of the Wildlife Society, is an organization of professional wildlife biologists with a goal of protecting wildlife population and habitat values in Nevada and adjacent Mono and Inyo Counties of California.

Wildlife managers, BLM representatives, grazing permittees, and others, are tasked with managing sustainable uses on public lands without compromising ecological integrity. When any one activity threatens sustainability, the others suffer. Nevada is the driest state in the nation and the overpopulation of wild horses and burros in the state is acutely felt by Nevada's wildlife populations. The current population of horses and burros managed by BLM in Nevada is approximately 50,000. High Appropriate Management Levels (AML) for horses and burros on BLM land in Nevada is 12,800, so horse and burro populations in Nevada are four times high AML. We note that an additional 1,500 horses occur on BLM land in Nevada that is managed by the California State BLM office and another 10,000 horses occur on other federal lands, and tribal and state lands. Biomass of horses is now three times the biomass of all native ungulates in Nevada and native ungulate populations have declined by nearly 30% over the last decade. Severe habitat degradation, often in areas lacking livestock, is well documented and is clearly negatively influencing ungulates. The negative impacts of overabundant horses on both riparian and upland habitats is almost certainly impacting nongame species, some of which are endemic to Nevada. The current situation in Nevada is clearly in violation of Wild and Free-roaming Horse and Burro Act, which calls for horses and burros to be managed consistent with a thriving ecological balance.

Overabundance of horses is not just affecting Nevada's wildlife, it is highly detrimental to the horses themselves. The extremely slow growth in horse numbers during the last two years, suggests a substantial increase in mortality, reduction in birth rate, or both. Starving horses and carcasses of horses that died of starvation or lack of water are common in the Virginia Range just east of Reno, where horses could be as much as 10 times AML. Because these horses are on state land there is no established AML but comparable areas of the state would be expected to support about 1/10th the number of horses currently present in the Virginia Range. Not coincidentally the bighorn sheep population in the Virginia Range has declined about 30% in the last two years.

The Nevada Chapter supports a policy of gathering and removing horses until AML is achieved. At this point widespread use of fertility treatments can sufficiently reduce birth rates so that removals could be less than 2,000 horses annually, all of which could be adopted. We believe that once AML is achieved this reduction in birth rates could be accomplished by annually gathering as few as 6,000 horses nationwide for application of fertility control and necessary removals. Once AML is achieved, no new horses would



have to be added to long-term holding, placing the Horse and Burro Program on a path that is sustainable over the long term. We fully support predictable and adequate funding for BLM to increase short-term holding facilities and contracts for long-term holding needed to support gathers and removals needed to reach AML within six years. This approach is least expensive, restores ecological conditions most rapidly, is most humane for the horses, and reduces the risk of Congress losing interest in achieving the goal of an economically and ecologically sustainable wild horse and burro program.

We note that the BLM's 2020 report to Congress and apparent current practice places a priority on using fertility control to maintain populations on Herd Management Areas (HMAs) that are at or near AML at their current levels. In our view, this approach is less effective, more expensive, and has made it nearly impossible to solve the problem of overabundant horses in Nevada. We believe that bringing all populations to AML first, then aggressively using fertility control is a better approach for several reasons. First, HMAs that are at AML typically support a relatively small number of horses. So, maintaining these HMAs at AML expends substantial resources for relatively little gain. In contrast, HMAs that are well above AML, as are many of the HMAs in Nevada, typically contain many hundreds to thousands of horses. Failure to devote sufficient resources to these HMAs results in thousands of new horses being added to the population annually. The outcome is substantial delay in achieving the goal of bringing all HMAs to AML in a reasonable amount of time. This delay causes increased ecological damage and will ultimately substantially increase the cost of the program because the increased number of horses produced on the range will eventually have to be removed and cared for in long-term holding facilities. We suggest that the current policy explains why Nevada, which supports 60% of the excess horses on BLM land, received only 37% of the gather budget in fiscal year 2023, and it is our understanding that no funds for gathers will be available in FY 2024, except for emergencies, which have been common in the last several years.

We strongly support BLM's receiving adequate funding to bring all HMAs to AML in a six-year time frame. Simultaneously, we support sufficient funds be applied to Nevada HMAs to achieve this goal locally. We are also supportive of research to improve fertility control; such research will reduce future need for gathers and the overall cost of the program. That said, for reasons describe above, we strongly urge a strategy that achieves AML as rapidly as possible, followed by widespread use of fertility control, which will substantially reduce the need for gathers in the long-term and can eventually eliminate the need for long-term holding.

Thank you for the opportunity to provide comment and for your service on the Advisory Board.

Sincerely, for the Executive Board,

A handwritten signature in cursive script that reads "James S. Sedinger".

James S. Sedinger, President
Nevada Chapter of the Wildlife Society