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## Office of the Governor

May 18, 2016

Mr. John Ruhs  
Nevada State Director  
U.S. Bureau of Land Management  
1340 Financial Boulevard  
Reno, Nevada 89502

Dear Mr. Ruhs:

I am writing in response to the letter sent by the Bureau of Land Management (BLM) in April of this year to several Elko County permittees regarding current grazing rights and seasons. In the initial correspondence to permit holders, the BLM stated that rangeland health is being negatively impacted, due to wild horse use in combination with livestock grazing, and that a reduction or elimination of livestock grazing is necessary. I believe this proposed action sends the wrong message by putting the onus on the livestock industry to solve this problem and prioritizes wild horse populations above livestock producers.

I'm very concerned about the over-population of wild horses in Nevada, the negative impact they have on our rangeland, and the burden of the proposed solution being solely put upon the livestock industry. Livestock grazing is carefully managed by designating limited seasons of use, allowable use levels, pasture rotations, and stocking rates. Livestock grazing is carefully monitored to achieve and maintain healthy rangeland. Wild horse herds are uncontrolled and increase at a rate of about 15 to 20 percent each year with no management plan besides the occasional, high cost round-ups which are not a permanent solution to the problem. It is unfair to ask permittees to sacrifice their livelihood in an attempt to mitigate the ecological impacts of wild horses while at the same time making no commitment to resolve the actual problems with the wild horse and burro program.

I appreciate your persistence and attention to this difficult issue and I am hopeful that your request to BLM headquarters in Washington, D.C. to gather more wild horses in Nevada is supported by the Bureau, the Department, and the Administration.

Properly funding the wild horse program is an essential first step to get wild horse numbers under control and back to Appropriate Management Levels (AMLs). Lack of funding and, therefore, lack of effective management is having a negative and detrimental impact on the livestock industry in Nevada. Furthermore, the lack of management of wild horses threatens the ecological sustainability of our rangelands, which of course led to your request to reduce livestock Animal Unit Months (AUMs) in Elko County.

I realize a decision to reduce or eliminate AUMs is made based on many factors in an attempt to maintain range condition. As you may know, the 2016 drought monitor was released on May 3, and showed very positive outcomes, resulting in Elko County no longer being an area of grave

concern. Widespread precipitation in Northeastern Nevada has provided healthy forage and water sources. Drought conditions in 2015 were a very different story and decisions based on that timeframe need to be revisited – especially decisions that drastically affect an industry and the livelihoods of many hardworking Nevadans.

Another matter that should be taken into consideration is that reducing or eliminating livestock grazing in this region will increase the risk of wildland fires. As a result of higher precipitation in late winter and early spring this year, the fine fuel sources, particularly cheatgrass and other grasses, have exploded leaving our public lands even more susceptible to ignition and uncontrollable wildfire. Normal livestock grazing this year will help reduce the extraordinary fuel loads and serve as an effective tool for reducing the risk of wildfire.

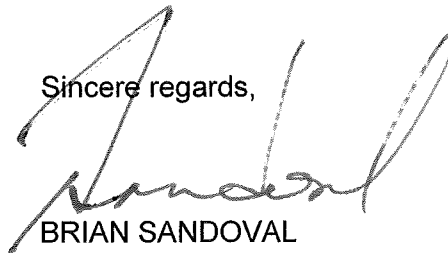
I am confident that if the BLM properly manages and funds the wild horse program, and uses all the authorities available under the law, great strides can be made in resolving the over population of wild horses and getting the herds back to AMLs the range can sustain. Because of the negative impact on livestock producers, the significant improvement in drought conditions in that region, and the benefit of livestock grazing in reducing the risk of wildland fire, I am asking that you reconsider your request to reduce or eliminate AUMs in Elko County this grazing season and continue to rigorously pursue a lasting resolution to this problem.

Generations of Nevadans have worked side-by-side with their local BLM partners to conserve, protect and maintain our precious natural resources and ensure our public lands are managed for future generations. I believe we can achieve the shared goals of preserving precious wildlife habitat, ensuring the sustainability and health of our public lands through multiple use management, and providing for our livestock industry to continue to operate successfully.

I am enclosing a letter I just received from Gracian Uhalde, Chairman of the N-4 State Grazing Board, for your information. Chairman Uhalde's letter recognizes your efforts to reduce the number of horses in Nevada and encourages the BLM to use the legislative authorities available to it to manage the wild horse and burro program.

Thank you again for reconsidering your decision to reduce or eliminate grazing in Elko County due to wild horse overpopulation. I appreciate your dedication to the multiple use of Nevada's public lands.

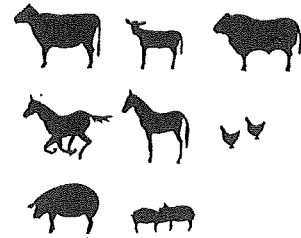
Sincere regards,



BRIAN SANDOVAL  
Governor

Enclosure

cc: Mr. Neil Kornze  
Director, Bureau of Land Management  
Ms. Sally Jewell  
Secretary, U.S. Department of the Interior



N-4 State Grazing Board  
P.O. Box 461  
Panaca, Nevada 89042  
775-728-4682  
May 16, 2016

Hon. Governor Brian Sandoval  
State Capitol Building  
101 North Carson Street  
Carson City, Nevada 89701

And

Attorney General Adam Laxalt  
Office of Attorney General  
100 North Carson Street  
Carson City, Nevada 89701

Re: Major excesses of horses throughout Nevada

Dear Governor Sandoval and Attorney General Laxalt

The N-4 State Grazing Board congratulates your considerable courage and astute judgement on your recent demand to BLM to adequately fund the wild horse program to allow for gathering excess wild horses down to Appropriate Management Levels in the Elko County area.

The purpose of this letter is to provide you both with more information that will allow you to expand this demand to BLM throughout all of Nevada. We believe that every area of Nevada suffers these very same major excesses of horses. We have attached an updated horse estimate through this 2016 foal crop for the N-4 district. This information was obtained from Ely BLM for the 2013 horse count year; and made current by the N-4 Board staff by adding Very Conservative foal crop estimates of 20 percent each year since. This updated horse count is attached hereto for your use. There are 130 ranching families in the N-4 District who are adversely affected by this horse excess today and have been for many years continuously in the past.

This Board certainly supports the recent announcement by Nevada BLM Director John Ruhs indicating he will ask for permission to gather some 4,000 wild horses this year in Elko County. N-4 has been calling attention to this problem on at least seven separate occasions with letters; and privately funded studies on impacts to outdoor recreation and to grazing; photographs of horses waiting to thirst to death here; and the above mentioned horse count figures for just the Ely BLM district. We have attached one picture that is indicative of the critical horse

excesses here. We will gladly furnish you copies of the Board's seven "excess wild horse letters" upon request.

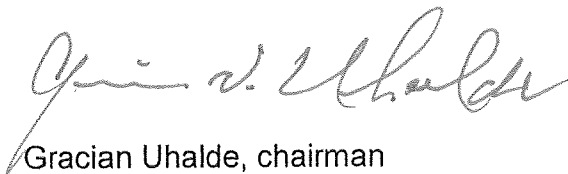
We call your attention to the certainty that if livestock were overstocked at the current levels of the wild horse population excesses, there would be an immediate and complete order for removal of all livestock, issuance of trespass notices, and criminal and civil sanctions brought to bear on the operating ranchers. This board is especially concerned about the presence of 1566 excess horses in "herd areas" which are mandated in the 2008 Record of Decision by BLM Ely District in the Resource Management Plan to be brought to zero horse numbers. Over the past eight years, this has never been done, resulting in gross overgrazing by the wild horse populations. A very conservative estimate of wild horse numbers in White Pine and Lincoln Counties today would be 6,738 in herd management areas and 1,566 in herd areas for a total of at least 8,304. The high AML for the HMAs is 2925 today where you can see there are 8,304 today.

It is important to recognize the lack of adherence to both the 1971 Wild Horse and Burro Act and the 1976 Federal Land Policy Management Act by BLM in not maintaining horse numbers at AML that results in a "healthy ecological balance" as detailed in both these acts, which call for well managed multiple uses. Over populations of horses also negatively impact other wild animals, both non-game and game species, as well severe economic hardships for local economies. Even if all cattle were removed from these ranges, the horses and the vegetation will continue to suffer and die out.

While this Board maintains an interest in the plight of the southeast Elko County ranchers, we look to all the other allotments in this N-4 District. Many have had grazing numbers reduced already, with some being faced with up to 70 percent livestock number reductions because BLM maintains the vegetation is not in an improving condition. This is caused by the forage being consumed 365 days a year by the wild horses.

Now is the right time to do something about this abuse of the public lands in all of Nevada. Please contact us at any time we may provide you with additional information on any issue affecting operating ranchers in eastern Nevada.

Very Sincerely



Gracian Uhalde, chairman  
N-4 State Grazing Board

Encls. 2016 horse numbers  
9-11-2015 Cabin Spring White Pine Co thirsty horses picture

cc: Nevada Congressional Delegation  
Jim Barbee, Director, Nevada Dept of Ag  
Tony Wasley, Director, Nevada Dept of Wildlife



Thirsty and starving horses on John Uhalde & Co Ranch owned Cabin Spring,  
White Pine County on September 11, 2015

Ely District Wild Horse Herd Management Areas  
 2014 Pre foal crop, USGS-Report  
 EYFY, 2014 contracting numbers  
 Ely District Office

Herd Area	Herd Mangement Area Name	Estimated Total Acres	AML	Population Estimate	Population Range	Last Gather	Last census
401	Antelope (HMAP)	331.000	150-324	413		Oct-12	Feb-12
412	Diamond Hills South	19.000	10-22	181		Jan-13	Jun-13
414	Eagle	670.000	100-210	751		Jan-11	Apr-12
415	Pancake	855.000	240-493	1085	1040*-1124	Sep-12	Feb-14
416	Silver King	606.000	60-128	377		Oct-10	Jan-12
417	Triple B	1,225.000	250-518	1093	1047*-1161	Jul-11	Feb-14
Ely District Subtotal		3,706.000	810-1695	3900			

Ely District Wild Horse Herd Areas

Herd Area	Herd Area Name	Estimated Total Acres	AML	Population Estimate	Population Range	Last Gather	Last census
406	Cherry Creek	27.448	0	32		Aug-06	Jun-08
408	Jakes Wash	153.663	0	115	103*-125	Jan-12	Feb-14
409	White River	116.060	0	149	129*-195	Aug-09	Feb-14
411	Seaman	358.834	0	228	18*-23	Jul-13	Feb-14
413	Moriah	53.312	0	94		Aug-10	Oct-10
512	Mormon Mountains	175.423	0	0			Jan-13
513	Meadow Valley Mountai	94.521	0	0		Oct-09	Jan-13
514	Blue Nose Peak	84.622	0	10		Oct-09	Jan-13
515	Delamar Mountains	183.558	0	196		Oct-09	Jan-13
516	Clover Mountains	167.998	0	179		Oct-09	Jan-13
517	Clover Creek	33.056	0	32		Oct-09	Jan-13
518	Applewhite	30.297	0	12		Oct-09	Jan-13
519	Little Mountain	53.035	0	23		Oct-09	Jan-13
520	Miller Flat	89.382	0	44		Oct-09	Jan-13
522	Highland Peak	136.071	*	*		Aug-08	Jan-12
523	Rattlesnake	71.433	0	0		Dec-08	Jan-12
Ely District Subtotal		1,828.713	0	908			

\*The lower 95% confidence interval limit (LCL) is actually less than the number of horses sighted during the survey for some estimates. This is a normal statistical result and reflects the fact that a confidence interval expresses what would likely happen if the survey were repeated. If repeated many times, some surveys would miss more horses and produce lower estimates, even after corrections than were actually observed during this survey. Clearly, I conclude that there are at least as many horses as were observed during this survey, rather than using the lower confidence limit as a minimum number.

	<u>HMA</u>
2013	3900
2014	4680
2015	5616
2016	6738

<u>H.A.</u>
908
1089
1306
1566

High AML for HMA's 2016  
2925 horses

6738 HMA  
1566 HA  
8304 in 2016

284% Over High AML