



National Association of Conservation Districts

April 13, 2016

National Wild Horse and Burro Program, WO-260
Attention: Ramona Delorme
1340 Financial Boulevard
Reno, Nevada 89502

Dear National Wild Horse and Burro Advisory Board:

The National Association of Conservation Districts (NACD) represents America's 3,000 conservation districts and the 17,000 locally elected men and women who serve on their governing boards. Conservation districts are local units of government established under state law to carry out natural resource management programs at the local level. Districts work with millions of cooperating landowners and operators to help them manage and protect land and water resources on private and public lands in the United States.

Stewardship of the land is essential to all Americans and districts are devoted to helping conserve all landscapes across our nation. One of the country's most storied and iconic landscapes is that of the American West. The rangeland of the West has its share of unique natural resource challenges, not least of which is the burden it carries of an overpopulation of wild horses and burros. This overabundance is critically damaging the ecology of western rangelands with severe, long-term consequences for the native plant and animal life that call it home. NACD recommends and supports the use of common-sense, ecologically-sound rangeland management practices to ensure healthy wildlife and rangelands for future generations.

Populations of wild horses and burros have been allowed to grow at a rate that in many places exceeds six times their Appropriate Management Level (AML). This situation has not only led to widespread degradation of the West's public lands, but has also had devastating effects on the health of the animals themselves who often face starvation and dehydration.

Wild horse and burro populations on public lands must be properly managed to prevent deterioration of rangeland resources and to minimize expense to the tax-paying public. Horse and burro numbers are far exceeding the Bureau of Land Management's (BLM) Resource Management Plans (RMPs) within the Horse Management Areas (HMA), and large numbers of horses and burros are occupying private and federal lands outside of the HMAs. Overpopulation on the HMAs combined with the intensive grazing habits of horses and burros, especially the tendency to bite off vegetation at dirt level and pawing grass roots out of ground when grass is short or under snow, are stressing our Nation's rangelands beyond natural recovery.

NACD supports long-term fertility control of wild horses and burros, including sterilization of females and males using humane and conventional practices, in an effort to reduce the wild horse and burro population to numbers within the AML as scientifically determined by federal agencies.

Fertility control alone will not reduce numbers in a timeframe that will protect the health of the range where numbers are double, triple, or quadruple that of the AML. Fertility control should be used in tandem with wild horse and burro removals.

The BLM needs to follow its RMPs in regard to appropriate management levels and remove excess horses and burros on designated HMAs on an annual basis, utilizing the least costly, humane methods and programs. Wild horses and burros found on private and federal lands outside of the HMAs should be removed immediately as to prevent any detrimental impact to rangeland health. Excess horses and burros that are not immediately adopted should be sold to the highest bidder to avoid extreme costs of caring for them.

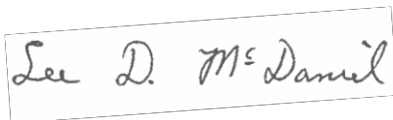
NACD encourages BLM to:

- Implement alternative methods to address wild horse and burro overpopulation and to reduce expenses to the taxpayer.
- Use sound scientific rangeland health practices to ensure protection and preservation of critical sage grouse habitat, other wildlife habitats, and multiple land use.
- Continue managing wild horse and burro populations to balance their impacts on rangeland resources with other public land uses while protecting the resource base.
- Oppose any action to expand HMA boundaries or establish new HMAs.
- Oppose any action to classify wild horses and burros as a threatened or endangered species, or classification as treasured herd status.
- Oppose any special management or protections of abandoned, feral, stray or otherwise unauthorized horses and burros.

NACD is available and willing to discuss with the BLM the formation of a partnership and work together to address the wild horse and burro problem, whether it be public outreach and education initiatives or other means.

Thank you for providing the opportunity to submit our public comments. NACD looks forward to continuing to work with BLM and the Wild Horse Advisory Board to address the over population of wild horses and burros.

Sincerely,



Lee D. McDaniel
NACD President