



## **National Association of Conservation Districts**

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September 7, 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 across the United States.

One of the country's most storied and iconic landscapes is that of the American West. The western rangeland has more than its share of unique natural resource challenges, but the overpopulation of wild horses and burros tops the list. The exponential population growth of wild horses and burros in the West has critically damaged rangeland ecology at the expense of native species and the American taxpayers. NACD strongly supports the use of common-sense, ecologically-sound rangeland management practices to protect and improve the health of western rangelands.

NACD recognizes the challenges that BLM faces in holding and feeding thousands of feral horses and burros on the range every year. BLM is responsible, however, for the multi-use management of public lands. Simply put, wild horse and burro overpopulation does not allow for multi-use; instead, it makes it impossible by degrading the quality of native wildlife habitats, riparian plant communities, disrupting critical watershed functions, and eliminating grazing opportunities.

Every four years the unregulated and non-native horse and burro population doubles, spreading out and exceeding the carrying capacity of more and more acres. Populations of wild horses and burros have been allowed to grow at a rate that in many places exceeds six times their AML. As their population increases, excess wild horses and burros move outside HMAs in search of feed and water – where the law is clear they are not to be located. In many cases they trespass on private lands and are known to attack or breed with domestic horses. Other times, they run native species like the greater sage-grouse, deer, elk, and migratory birds, from forage and water, thereby decreasing the native species chance of survival and forcing them to move from their historic habitat. Without healthy rangelands, all species – including wild horses and burros – in the ecosystem are at risk of population losses.

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Over the past several years, voluntary, collaborative, and locally-led conservation efforts have resulted in the enhancement of rangeland health and the recovery of the native species like the greater sage-grouse. These victories will likely be short lived, however, as private land managers can only do so much. On their own initiative livestock owners are transporting water onto public lands as a best management practice to ensure proper distribution of livestock. Wild horses often utilize these additional water sources.

The current management scheme is ineffective and unsustainable. At present, more than twice the number of wild horses are on the range than it can sustain, with little fertility control being implemented. Limited numbers (3,500) of horses are gathered and removed from the range annually, often removed via emergency gathers, while this year's population will increase by approximately 13,400. The BLM's adoption program currently adopts out approximately 2,500 wild horses and burros annually. The numbers just don't add up.

NACD supports the use of 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 their populations to within the AML as scientifically determined by federal agencies.

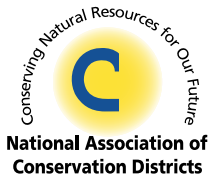
Fertility control alone will not reduce numbers in a timeframe that will protect the health of the range where numbers are double, triple, and or quadruple that of the AML. For this reason, fertility control should be used in tandem with wild horse and burro removals. Once AML is reached, NACD strongly supports all forms of fertility control to prevent the numbers from increasing, which would again require removals.

NACD encourages the BLM to follow its RMPs in regards to appropriate management levels and:

- Remove excess wild horses and burros on designated HMAs on an annual basis, utilizing the least costly, humane methods, and programs that are effective at achieving AML;
- Begin to use fertility control methods such as sterilization across all HMAs;
- Immediately remove any wild horses and burros found on private or federal lands outside of the HMAs in order to prevent any detrimental impact to rangeland health; and
- Allow for the sale of wild horses and burros without restriction to the highest bidder if any excess animals are not immediately adopted to avoid burdening the agency with the extreme costs of caring for them.

The National Wild Horse and Burro Advisory Board should address the overpopulation of wild horses and burros by first considering the full suite of management tools available, and then by encouraging both the Secretaries of the Interior and Agriculture to implement the tools needed to achieve ecologically-sustainable wild horse and burro populations within a reasonable amount of time.

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



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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*

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NACD President