



National Association of Conservation Districts

October 1, 2018

U.S. Department of the Interior
Bureau of Land Management
National Wild Horse and Burro Program
Attention: Dorothea Boothe WO-260
20 M Street SE, Room 2134LM
Washington, DC 20003

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 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.

Americans and districts are devoted to helping conserve all landscapes across our nation through proper stewardship of the land. Western rangelands have their share of unique natural resource challenges, specifically when it comes to the burden the overpopulation of wild horses and burros presents. This overabundance is critically damaging the ecology of western rangelands with severe, long-term consequences for native plants and animals. NACD recommends and supports common-sense, ecologically-sound rangeland management practices to ensure healthy wildlife and rangelands are preserved for future generations.

Wild horse and burro populations have been allowed to grow at a rate that, in many places, exceeds three times the national Appropriate Management Level (AML). This has not only led to widespread degradation of the West's public lands but has left devastating effects on the health of the animals 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 minimize expense to the tax-paying public. Horse and burro numbers are far exceeding the Bureau of Land Management's (BLM) Resource Management Plans 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, 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, by using humane and conventional practices 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.



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The BLM needs to follow its resource management plans to ensure 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 HMAs should be removed immediately to prevent any detrimental impact to rangeland health. Excess horses and burros not immediately adopted should be sold to the highest bidder to avoid extreme costs to care for them.

NACD encourages BLM and the advisory board to:

- Implement alternative methods to address wild horse and burro overpopulation and reduce expenses to the taxpayer.
- Use sound scientific rangeland health practices to ensure the 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.
- Support spaying and neutering wild horses and burros irrespective of their destination to help reduce the number of wild horses and burros in the AML.
- Partner with states, local governments and tribes to assist in the management of the Wild Horse and Burro Program within their respective jurisdiction if supported by the affected districts.

Thank you for providing the opportunity for NACD to submit public comments. NACD looks forward to working with BLM and the National Wild Horse Advisory Board to continue addressing the over population of wild horses and burros.

Sincerely,

Brent Van Dyke

President

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