



National Association of Conservation Districts

May 3, 2019

Jon D. Sherve
Field Manager, Mount Lewis Field Office
Bureau of Land Management
50 Bastian Road
Battle Mountain, Nevada 89820

Submitted via email to Shawna Richardson, Wild Horse and Burro Specialist

RE: Temporary Range Improvements – Water Hauling, Mount Lewis Field Office

Dear Mr. Sherve:

The National Association of Conservation Districts (NACD) represents America's 3,000 locally-led conservation districts, working with millions of landowners and operators to help them manage and protect land and water resources on private and public lands. Established under state law, conservation districts share a single mission: to work cooperatively with federal, state and other local resource management agencies and private sector interest groups to provide technical, financial and other assistance to help landowners and operators apply conservation to the landscape at the local level.

NACD also serves on the Steering Committee of the National Horse & Burro Rangeland Management Coalition, where it advocates for proper horse management to ensure rangeland health. Through this Coalition, NACD members have seen the rangeland damage within the Fish Creek Herd Management Areas (HMA) due to populations exceeding Appropriate Management Levels (AML).

Wild horse and burro populations on public lands must be adequately managed to prevent deterioration of rangeland resources and minimize expense to the tax-paying public. Horse and burro numbers far exceed the Bureau of Land Management (BLM)'s AML within the HMA, and large numbers of excess horses and burros occupy private and federal lands outside of the HMAs. Overpopulation on the HMAs, including Fish Creek, combined with the intensive grazing habits of horses and burros, are stressing our nation's rangelands beyond natural recovery.

In the public announcement, it states "the population following the 2019 foaling season is estimated to grow to 752 horses, or 442 percent of the high range of the AML" in the Fish Creek HMA. NACD supports temporary water hauling within the Fish Creek HMA only if needed to avert emergency conditions and urges the BLM to bait and trap the wild horses for removal from the range to prevent further ecosystem degradation. Providing emergency water hauling without the necessary gathers to reduce the population to or below AML will only exacerbate the degradation of natural resources within the HMA. NACD urges the BLM to use this time to obtain authorization for an immediate gather to low-end AML to ensure healthy wildlife and rangelands are preserved for future generations.



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Thank you for the opportunity to participate and submit comments on the temporary range improvements. We appreciate your consideration and look forward to continuing to work with you in the future on the management of the wild horse and burro population.

Sincerely,

Michael Crowder
Frist Vice President
National Association of Conservation Districts