



National Association of Conservation Districts

October 31, 2019

U.S. Department of the Interior
Bureau of Land Management
National Wild Horse and Burro Program
Attention: Advisory Board WO-260
20 M Street SE, Room 2134LM
Washington, D.C 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. Conservation 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.

NACD submitted similar comments to the advisory board in July 2019. Conservation districts are devoted to conserving natural resources on 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 that overpopulation of wild horses and burros presents. This overabundance is critically damaging to the ecology of western rangelands, causing 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.

Per the Bureau of Land Management's (BLM) own data, horse populations have more than doubled over the last ten years. In 2009, it was reported there were roughly 36,940 wild free-roaming horse and burros on federal lands.¹ Over the last decade, that number has increased to 88,090 wild horses and burros.² With growing horse populations in many Herd Management Areas (HMA), we have started seeing a mass degradation in the health of our western rangelands.

Wild horse and burro populations on public lands must be properly managed to prevent further deterioration of rangeland resources and to minimize expense to the tax-paying public. Horse and burro numbers far exceed the BLM's Resource Management Plans within the 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, is stressing our nation's rangelands beyond natural recovery.

¹ "Wild Free-Roaming Horse and Burro Populations as of February 28, 2009"

https://www.blm.gov/sites/blm.gov/files/wildhorse_quickfacts_doc5.pdf

² "Herd Area and Herd Management Area Statistics as of March 1, 2019"

https://www.blm.gov/sites/blm.gov/files/2019_Final_HAHMA_Stats_05022019_final_508.pdf



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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.

The BLM must follow its Resource Management Plans to ensure appropriate management levels by removing 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 further detrimental impact to rangeland health. Excess horses and burros not immediately adopted should be sold to the highest bidder to avoid the burden of extreme care costs upon the BLM and the American taxpayer.

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; and
- Supplement feed and water to wild horses and burros only for baiting and trapping them for removal from the range to prevent further ecosystem degradation.

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 overpopulation of wild horses and burros on western rangelands.

Sincerely,

A handwritten signature in black ink that reads "Tim Palmer".

Tim Palmer
President
National Association of Conservation Districts