



National Association of Conservation Districts

September 18, 2020

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.

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 was pleased to see additional funding for wild horse and burro management proposed by the President. Additionally, 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, exceptionally exceeds 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 that often face starvation and dehydration. Additionally, overpopulation can negatively impact endangered species. While both the Bureau of Land Management (BLM) and U.S. Forest Service (USFS) have been executing programming targeted at bringing population numbers under control, current, overpopulated population levels are stressing our nation's rangeland beyond the point of recovery.

In 2009, it was reported there were roughly 36,940 wild free-roaming horses and burros on federal lands.¹ In 2020, over three times as many animals are on public lands than the AML is able to support. BLM has determined that the AML for wild horse and burro populations is approximately 26,770 animals. BLM's most current data states, as of March 2020, an estimated 95,114 animals are on federally managed public lands.² With growing horse populations in many Herd Management Areas (HMA), we are 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 HMAs, and large numbers of horses and burros are occupying private and federal lands outside of the HMAs.

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 Areas Statistics as of March, 2020"
https://www.blm.gov/sites/blm.gov/files/wildhorse_2020_HAHMA_Stats.pdf



National Association of Conservation Districts

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.

Although fertility control does offer some relief from the rate of overpopulation growth, wild horse and burro populations must be addressed immediately. 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 measures only work effectively when horse or burro herds are at or near AML. Fertility control should be used in tandem with wild horse and burro removals.

The BLM must follow its Resource Management Plans (or other management decisions such as Final Multiple Use Decisions) 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 is a member of the [National Wild Horse and Burro Rangeland Coalition](#) and supports the “The Path Forward for Management of BLM’s Wild Horses & Burros.” While NACD has policy stating support of implementation of the Wild and Free Roaming Horses and Burros Act, we have a strong preference for solutions that bring excess horses to levels conducive to rangeland health without using unconditional sale and lethal management. We will always support management options which bring excess herd to AML in a timely way while avoiding unconditional sale and lethal management. “The Path Forward for Management of BLM’s Wild Horses & Burros” is the only proposal we have seen that takes this approach and not only models the ability to reach AML but seeks to leverage private resources to do so (as opposed to relying solely on taxpayer funding).

NACD encourages BLM, USFS and the advisory board to:

- Implement alternative methods to address wild horse and burro overpopulation and reduce expenses to the taxpayer;
- Take formal action to support “The Path Forward for Management of BLM’s Wild Horses & Burros” and make a recommendation that Congress, BLM and USFS move forward with providing the funding and capacity to fully implement it in order to achieve AML in a reasonable timeframe;
- 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 and other fertility control measures, including reversible methods such as IUDs, of 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 conservation districts; and



National Association of Conservation Districts

- 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 the opportunity to submit public comments. NACD looks forward to working with BLM, USFS and the National Wild Horse Advisory Board to continue addressing overpopulation of wild horses and burros on western rangelands.

Sincerely,

A handwritten signature in cursive script that reads "Tim Palmer".

Tim Palmer
President
National Association of Conservation Districts