



Nevada Association of Counties

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April 25, 2022

Bureau of Land Management
1849 C Street NW
Washington, DC 20240

Via email: BLM_HQ_MotorizedVehicleHearing@blm.gov

RE: Bureau of Land Management's Public Hearing on the Use of Motorized Vehicles for Wild Horse and Burro Management

To Whom It May Concern:

As the state association for Nevada's counties, the Nevada Association of Counties ("NACO") appreciates the opportunity to provide comment on the Bureau of Land Management's ("BLM's") annual hearing regarding the use of motorized vehicles for the management of wild horse and burro ("WH&B") populations. If NACO's comments conflict with those provided by associated Counties, NACO would ask the BLM to defer to the County-specific comments, as those individual counties better understand their circumstances and needs regarding the use of motorized vehicles to manage WH&B populations.

Nevada has by far the largest population of wild horses and burros on public lands of any State. The Free-Roaming Wild Horses and Burros Act of 1971 requires the BLM to maintain populations at agency determined appropriate management levels (AML). Wild horse and burro populations continue to far exceed AMLs. Overpopulation remains the number one impact to effective land management and has created serious environmental concerns for wildlife, the ecology of Nevada's rangelands, and for the horses themselves. Wild horses continue to suffer death from starvation, dehydration, and resource scarcity.

NACO, along with a variety of other rangeland ecosystem stakeholders, continue to support the "[Path Forward For Management of BLM's Wild Horses and Burros](#)" proposal which recognizes the necessity for targeted gathers and removals at densely populated Herd Management Areas, as well as the treating of horses with growth suppression tools (fertility controls). These management efforts simply cannot be carried out in an efficient and effective way without the use of motorized vehicles – helicopters in particular - given the spread of WH&B herds across wide areas of varied and rugged terrain. NACO believes that federal land management agencies should be given all available resources and tools to effectively manage the WH&B population. This will ensure healthy WH&B species and preservation of the rangeland to allow for continued multiple use of our nation's public lands.

Multiple peer reviewed studies, including the BLM's internal studies, have shown that helicopter gathers are safe and humane for WH&B's. The mortality rate of horses during helicopter gathers has consistently been extremely low. Most of the fatalities that have occurred during the multiple helicopter gathers have been among horses with preexisting conditions. The American Association of Equine Practitioners have

determined that BLM horse gather practices, including those using helicopters, are efficient, effective, and that these gathers do not affect behavior or reproduction. Horses do not display signs of distress, and levels of exhaustion after a gather are not outside of the normal range.

Conclusion

We would like to thank the BLM for their consideration of the input and recommendations of Nevada's counties on the management of Wild Horse and Burro population within our state. Notwithstanding some recent media attention around the unfortunate loss of mares and colts due to rare accidents during roundups, NACO strongly encourages the BLM to continue to base its decision making on scientific research and statutory obligations. The research on helicopter gathers is clear – the gathers are safe, humane, and are the most efficient means of bringing WH&B herds in line with the Wild Horse and Burro Act's mandated levels as quickly and safely as possible. As long as herds continue to exceed AMLs, Nevada counties will continue to sustain damages to rangeland ecosystems and the multi-use opportunities on public lands in their jurisdictions. NACO recommends and supports additional training of the contracted helicopter pilots on equine science and stockmanship to further reduce, the already rare occurrence, or likelihood of future loss-of-life accidents during WH&B gathers.

Thank you for your attention and consideration of these comments. If you have any questions, please do not hesitate to contact me via email: vguthreau@nvnao.org, or by phone at (775) 883-7863

Respectfully,



Vinson W. Guthreau
Executive Director
Nevada Association of Counties

