



National Wild Horse and Burro Program, WO-260
Attention: Ramona DeLorme
1340 Financial Boulevard
Reno, NV 89502-7147
Via email only: whbadvisoryboard@blm.gov

October 4th, 2017

Re: Advisory Board Comment (82 FR 45883)

To the Advisory Board,

While representatives of the American Sheep Industry Association (ASI) were not able to attend this meeting of the Wild Horse and Burro Advisory Board meeting in October, I want to express our appreciation for your efforts and our support for the recommendations this board made in September 2016.

ASI notes that the population growth of wild horses and burros in the western United States has continued to outpace natural death loss and adoption rates. Further, this overpopulation has been a major contributor to range degradation and the reduction of biodiversity and productivity for wildlife and livestock. Our members understand all too well that feedlot style holding is not an economically feasible long-term solution. ASI policy supports a comprehensive program for bringing wild horse and burro populations within the Appropriate Management Levels through the use of fertility control, sex ratios and any other humane means of population reduction.

Our members have seen the continued and unchecked growth of these wild horse and burro populations. Overpopulated herds have stripped the range of natural resources, leading to malnourishment and a lack of even the base needs to sustain life. This has not only compromised the federal requirement under the Federal Land Management Act to manage public lands for multiple-use, but has resulted in animal welfare concerns amounting to gross negligence. It has become clear that no single tool can bring these herds back to appropriate levels. While fertility control and adoption remain a component, other humane methods, like euthanasia, must be implemented as part of a comprehensive plan.

Across the west, we see designated Herd Management Areas that are double, triple, and even quadruple the AML. While a decade ago, these cases would have been outliers, all too frequently, they are becoming the normal. With continued growth rates of 20 to 25% per year, this problem will not solve itself. Now is the time for action and America's sheep producers stand ready to support a meaningful and comprehensive approach to wild horse and burro management.

Sincerely,

Chase Adams
Senior Policy and Information Director
American Sheep Industry Association