



My name is Grace Kuhn, I submit these comments on behalf of the American Wild Horse Preservation Campaign -- a coalition of more than 60 organizations working to protect America's wild horses and burros.

As the Northeastern Great Basin Resource Advisory Council knows, the record drought affecting much of the West is undeniable. Despite the escalating drought crisis, the BLM, with few exceptions, continues to allow private commercial livestock to graze on the public lands in this area, with only token reductions in grazing levels in some areas. The level of grazing under these extreme conditions is causing potentially irreversible damage to the fragile desert/sagebrush ecosystem.

The voluntary reductions that ranchers are being asked to make are not sufficient.

We are particularly concerned that the failure to reduce livestock grazing in designated wild horse and burro HMAs will be used to create a crisis on the range that will lead to wild horse starvation and dehydration. Because of this looming threat, all livestock grazing in HMAs that currently are drought-stricken must be reduced or completely eliminated. As you know, according to law, wild horses and burros are to be given top priority in the HMAs.

43 CFR 4710.5 states that public lands can be closed to livestock grazing "If necessary to provide habitat for wild horses or burros...or to protect wild horses or burros," and that "Closure may be temporary or permanent."

[If time permits, please continue reading]

It is entirely shortsighted public policy at this time to placate rancher's desire for public land grazing and jeopardize the future of the range for everyone and everything for generations to come.

Ranchers have access to additional federal subsidies to buffer or offset financial losses in times of drought – while wild horses and wildlife are left to perish on livestock-depleted rangelands. This is not an equitable situation, nor is it one that the American public supports.

The BLM should have halted all livestock grazing in HMAs over a year ago, when signs of drought were becoming increasingly apparent. Instead the agency allowed and continues to allow the range to be overgrazed by privately-owned cattle.

While commercial livestock grazing is permitted on public lands, it is not a requirement under the agency's multiple use mandate as outlined in the Federal Land Policy and Management Act of 1976 (FLPMA). Indeed, public land grazing clearly is a privilege not a right, while the **BLM is mandated by law to protect wild horses and burros**. Therefore, the agency's management should reflect these priorities and legal requirements.

Thank you.