

Public Comment for Upcoming Commission Meeting

**Name**

Nina Eydelman

**Address**

P.O. Box 11395  
Albuquerque, New Mexico 87192  
United States  
[Map It](#)

**Email**

[nina@apnm.org](mailto:nina@apnm.org)

**Comments:**

Dear Sandoval County Commissioners:

Thank you for this opportunity to submit comments on the proposed "Ordinance to Ban Feeding of Wild Horses."

Animal Protection New Mexico (APNM) is a statewide 501(c)(3) nonprofit organization, founded over 40 years ago, that advocates for the protection and humane treatment of animals by effecting systemic change. APNM's equine program seeks to expand the safety net for New Mexico's free-roaming and domestic equines through direct services such as emergency feed and gelding assistance as well as work to improve policies affecting equines.

We promote population management strategies such as the immunocontraceptive PZP vaccine for mares and gelding for stallions as humane alternatives to the endless cycle of roundups and removals that often results in equines being sold for slaughter. For example, we are partnered with the Ramah Navajo Chapter, and are participants in the Carson Partnership for Horse Management, in both cases to assist with their goals of the humane management of free-roaming equines.

We support the Board of County Commissioners' intent to make Sandoval County safe and sustainable for horses and humans alike, and to decrease and discourage human-horse conflicts. We also appreciate that the ordinance does not enact a blanket ban on feeding free-roaming horses, as this would be cruel, given the current circumstances on the range. However, we believe the ordinance as written does not adequately addresses these issues and urge the County to incorporate changes to the proposed "Buffer Zone" restriction, including the addition of a permit for feeding outside of those zones.

The Current Draft Ordinance Falls Short:

For example, one of the stated concerns the ordinance purports to address is that the feeding of wild horses makes them dependent on humans and leads them to stay in populated areas. We are aware that the feeding of wild horses in Placitas residential neighborhoods has sparked heightened conflict among neighbors. Yet the proposed "Buffer Zone" includes heavily populated areas, including the Ranchos Community where tension between neighbors is already high. Since it is most convenient for residents to feed horses close to their homes, this could effectively concentrate unrestricted feeding in residential portions of the Buffer Zone and exacerbate existing neighborhood conflicts.

Another stated concern is that an overpopulation of wild horses has led to traffic accidents, and that increased enforcement and penalties for horse-related traffic issues has not been effective. We appreciate that the Buffer Zone is well away from NM 165. Yet multiple roads are within the Buffer Zone, and the ordinance includes no prohibition about feeding horses close to a road.

Another stated concern is that there are people who feed wild horses irresponsibly and aggravate these problems, and that the approach of counseling such people has not worked. Yet while the proposed ordinance designates the Buffer Zone as the area to feed horses, it provides no guidance about how to feed horses responsibly (for example: grass hay only, no alfalfa and sweet feeds). Thus, these same people may continue to put out feed inappropriate or even dangerous for the horses and leave feed close to roads or close to unconsenting neighbors.

We support the establishment of designated feeding areas for horses. However, it is concerning to us that the proposed feeding Buffer Zone is adjacent to BLM and Albuquerque Open Space land. Feeding horses in these areas could increase the likelihood that they will cross more frequently into BLM land, where they are at risk for being rounded up and removed by the federal

agency. It could also increase the likelihood that they will cross more frequently into Albuquerque Open Space land, potentially putting them in conflict situations with human recreators and smaller companion animals. Also, the ordinance does not mention whether the Buffer Zone will be visibly marked. It is hard for people to estimate 1,000 feet away from invisible boundaries, so well-intentioned people may err on the side of feeding horses closer to federal or City land, thus drawing horses even more into those areas. Given the potential for drawing more horses onto federal lands, we wonder if BLM has been consulted about the proposed Buffer Zone.

Proposed Changes to Improve the Ordinance:

Instead of the currently proposed feeding Buffer Zone, we suggest the establishment of multiple designated feeding areas which are: (1) not adjacent to federal lands, (2) mindful of residential areas with higher rates of human-horse conflict, and (3) located a safe distance from a road. We also recommend adding markers to show the boundaries of each feeding area, and signage with instructions about appropriate kinds of feed and safety precautions for both humans and horses (ex: a recommendation of spacing out feed piles in order to avoid conflicts between horse bands competing for the same pile).

We strongly support the issuing of permits in order to allow individuals to feed horses outside of designated feeding areas. Such permits could be a useful tool in helping the County determine where and when horses are fed (i.e. away from roads), to monitor and manage the movement of herd and family bands based on access to feed, to instruct individuals about appropriate feed for horses, and to counsel individuals about safety precautions. However, the basic structure and procedure of the permitting process should be published in law at the same time that the feeding restrictions are set in place. Passage of this ordinance without it being clear what kind of permit program will be established, ideally with input from equine experts and the public, is premature.

We propose a permitting process with guidelines developed in consultation with appropriate experts, including equine specialists and law enforcement. Considerations for the issuing of a permit should include, at a minimum, the appropriateness of the location where the feeding will take place and the appropriateness of what food will be fed. We further propose that if a permit is awarded, to reduce administrative burden and encourage resident compliance, the permit should last for one year as long as guidelines are followed by the applicant. Permits should be issued for a nominal fee which does not exceed \$25 and which contributes to covering the County's administrative and/or enforcement costs.

Thank you so much for your time and consideration of our input.

Sincerely,

Nina Eydelman  
Chief Program & Policy Officer – Equine & Wildlife  
Animal Protection New Mexico