

THE WILDLIFE SOCIETY

Leaders in Wildlife Science, Management and Conservation

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The Wildlife Society thanks the Advisory Board for the opportunity to provide comments today. The Wildlife Society, founded in 1937, represents over 10,000 professional wildlife biologists and managers dedicated to excellence in wildlife stewardship through science and education. Our mission is to inspire, empower, and enable wildlife professionals to sustain wildlife populations and habitats through science-based management and conservation.

The Wildlife Society supports the Bureau of Land Management's (BLM's) National Wild Horse and Burro Program and its mission to ensure that healthy herds thrive on healthy rangelands.¹ However, with current on-range populations exceeding ecologically sustainable levels, The Wildlife Society has grown increasingly concerned about current horse and burro management options and the ability of those options to fulfill the Program's mission. The continued overpopulation of federally managed horses and burros on public lands threatens the ecological integrity of our rangelands while unduly impacting the ability of wildlife professionals to effectively manage and promote healthy rangelands and native species for future generations.

As a result, The Wildlife Society urges the Advisory Board to recognize the dire nature of ecological overpopulation of feral horses and burros by requesting that the U.S. Forest Service and BLM direct adequate attention and resources towards removing enough horses and burros from rangelands each year to conserve our ecologically diverse rangelands and measurably improve currently degraded areas.

Bureau of Land Management

The BLM has established an on-range Appropriate Management Level (AML) of 26,715 federally designated "wild" horses and burros.² An AML describes the optimum number of horses and burros that can graze without causing damage to the range while also taking into account maintaining a thriving ecological balance with wildlife, domestic livestock, and vegetation.³ As of March 1, 2017, BLM estimates that on-range wild horse and burro populations exceed 72,000—over two and a half times greater than the AML.⁴ With an estimated annual population growth rate of 15–20%,⁵ combined with a low number of range removals, wild horse and burro populations will likely surpass 85,000 by next year—double the number of horses and burros present on the range in 2013. In the absence of new management options by BLM, wild horse and burro populations will continue to grow at rates that will see on-range population numbers double every four to five years.⁶

¹ BLM, *Wild Horse and Burro Program*. Retrieved October 13, 2017, from https://www.blm.gov/sites/blm.gov/files/wildhorse_quickfacts_infographic_web.pdf.

² BLM, *Wild Horse and Burro Program Data*. Retrieved October 13, 2017, from <https://www.blm.gov/programs/wild-horse-and-burro/about-the-program/program-data>.

³ BLM, *Wild Horse and Burro Maintaining Range and Herd Health*. Retrieved October 13, 2017, from <https://www.blm.gov/programs/wild-horse-and-burro/herd-management/maintaining-range-and-herd-health>.

⁴ Program Data, *supra*.

⁵ National Academy of Sciences, *Using Science to Improve the BLM Wild Horse and Burro Program* 66 (2013), available at http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprd3796106.pdf.

⁶ NAS, *supra* at 13.

U.S. Forest Service

The U.S. Forest Service (USFS) also manages federally designated “wild” horse and burro populations across 34 Herd Territories.⁷ As of February 2014, USFS estimates that 6,483 horses and burros inhabited Forest Service Herd Territories, which have an AML of 2,253 animals.⁸ Based on annual population growth estimates and minimal use of population control measures, current populations likely now exceed 10,000—more than four times greater than AML.

Recommendations

The overpopulation of horses and burros on public lands has directly contributed to degradation of rangeland ecosystems and hampered the ability of wildlife professionals to sustainably manage and conserve native wildlife populations.⁹ For these reasons, The Wildlife Society encourages the Advisory Board to support and prioritize science-based management solutions that will quickly and effectively reduce the number of on-range horses and burros to ecologically-sustainable levels. The Wildlife Society requests that the Advisory Board highlight and emphasize Recommendation 8 from the September 2016 meeting, which encourages the full use of all tools made available and directed by the Wild Free-Roaming Horses and Burros Act to reduce populations and control population growth.

In FY2018, BLM suggests that it will reduce the number of animals gathered and removed from the range; in FY2017, BLM planned to remove approximately 2,500–3,000 horses and burros from the range.¹⁰ ***Corralling less than 4% of the on-range population will not reduce the population - it won't even stop the population from growing*** - and further degradation of our rangeland ecosystem will result. The Wildlife Society strongly encourages the Advisory Board to recommend that the BLM continue working to reduce the number of horses and burros on the range, by increasing the number of animals gathered and removed or by other effective means, to achieve AML in a reasonable amount of time, and conserve the range.

In the past, the removal of excess horses and burros through gathers helped to maintain the ecological health of rangelands.¹¹ However, sharp declines in adoption rates, combined with restrictions on using humane euthanasia and unrestricted sale of gathered horses, have led to over 45,000 horses and burros living in off-range holding facilities at a cost of approximately \$50 million per year.¹² With limits to the amount of horses and burros off-range holding facilities can accommodate, BLM now only removes roughly as many horses and burros as can be adopted, thus exacerbating the existing on-range overpopulation.¹³

⁷ USFS, *About the Wild Horse and Burro Program*. Retrieved October 13, 2017, from <https://www.fs.fed.us/wild-horse-burro/aboutus.shtml>.

⁸ USFS, *US Forest Service Wild Horse and Burro Territories*. Retrieved October 13, 2017, from <https://www.fs.fed.us/wild-horse-burro/documents/territories/USFSWildHorseBurroTerritories2014.pdf>.

⁹ Beschta, R.L., Donahue, D.L., DellaSala, D.A., Rhodes, J.J., Karr, J.R., O'Brien, M.H., Fleischner, T.L. & Williams, C.D., *Adapting to Climate Change on Western Public Lands: Addressing the Ecological Effects of Domestic, Wild, and Feral Ungulates*, ENVIRONMENTAL MANAGEMENT (2013) 51: 481, available at <http://www.uwo.edu/law/directory/files/donahue.pdf>.

¹⁰ *Id.*

¹¹ U.S. Government Accountability Office, *Bureau of Land Management: Effective Long-Term Options Needed to Manage Unadoptable Wild Horses* 3 (2008), available at <http://www.gao.gov/assets/150/149472.pdf>.

¹² Program Data, *supra*.

¹³ U.S. Dep't of Int., *Budget Justifications and Performance Information for Fiscal Year 2017: Bureau of Land Management VII-61* (2016), available at https://www.doi.gov/sites/doi.gov/files/uploads/FY2017_BLM_Budget_Justification.pdf.

Additionally, only five times in the 45 year history of the Wild Horse and Burro Program has the number of annual horse and burro adoptions ever matched or exceeded the level of population growth experienced between 2015 and 2016 (8,877).¹⁴ Since the peak of wild horse and burro adoptions in 1987 (12,776), annual adoption rates have declined by nearly 80%, with BLM only managing to adopt out 2,912 horses and burros in FY 2016 (despite increasing expenditures on adoptions to \$7.3 million).¹⁵ Adoption may be portrayed to represent the most socially acceptable method of relocating horses off the range, but it fails to provide a viable long-term solution to curbing population growth rate. Even if adoptions increase back to their maximum historic level, it would not even account for annual population growth, and has no hope of reducing the overpopulation of horses and burros currently on the range.

The Wildlife Society recognizes that population growth suppression methods will also serve as a potential management tool. However, The Society has concerns about effectiveness of fertility control methods in curbing wild horse and burro population growth rates. Current logistical difficulties and financial barriers to widespread implementation of fertility control make it unrealistic to assume that fertility-based control measures will reduce the need to remove animals from public lands in the near future.¹⁶ We support the continued development of permanent mare sterilization techniques,¹⁷ and believe sterilization is preferred over the currently available fertility control vaccine, *porcine zona pellucida* (PZP), which has proven unsuccessful as a long-term solution due to its short-lived effectiveness (up to 22 months).¹⁸ Combining fertility control and adoptions could potentially mitigate horse and burro population growth in the future, but would not eliminate the need to expand removals to prevent further rangeland degradation due to overpopulation of horses and burros.¹⁹

We recognize that BLM is currently over-burdened, both financially and logistically, by the large number of excess horses and burros in off-range holding facilities. The Wildlife Society has urged Congress to remove restrictions currently placed on several management activities authorized by the Wild Free-Roaming Horses and Burros Act of 1971, as amended, to allow for better management of herds and ultimately reduce the growing burden on BLM and U.S. taxpayers.²⁰ If this occurs, we urge the Advisory Board to continue supporting full use of *all* authorized powers to bring horse and burro populations to levels that conserve native rangeland ecosystems and the health of on-range horses and burros.

The Wildlife Society supports the desire for the well-being and humane treatment of horses and burros in all management actions. We also recognize that taking no action with regards to on-range horse and burro populations represents one possible management decision. However, continuing to follow this path will almost certainly result in detrimental effects to everything

¹⁴ Program Data, *supra*.

¹⁵ *Id*; BLM, *Wild Horse and Burro Removal, Adoption, Population, AML Table – 1971-2007*. Retrieved August 31, 2016, from

http://www.blm.gov/style/medialib/blm/wo/Planning_and_Renewable_Resources/wild_horses_and_burros/pls_herd_area_statistics/2007.Par.69794.File.tmp/PLS%202007%20complete%20crap.pdf.

¹⁶ Bartholow, John, *Economic Benefit of Fertility Control in Wild Horse Populations*, THE JOURNAL OF WILDLIFE MANAGEMENT 71(8): 2815–2816 (2007).

¹⁷ U.S. Dep't of Int., *Mare Sterilization Research: Environmental Assessment*, DOI-BLM-OR-B000-2015-0055-EA, available at https://eplanning.blm.gov/epl-front-office/projects/nepa/56292/67242/73184/MareSterilizationResearchEA_12172015.pdf.

¹⁸ Bartholow, *supra*; BLM *Wild Horse and Burro Science and Research*, Retrieved October 13, 2017, from <https://www.blm.gov/programs/wild-horse-and-burro/herd-management/science-and-research>.

¹⁹ NAS, *supra* at 304.

²⁰ National Horse & Burro Rangeland Management Coalition, *Testimony for oversight hearing entitled “Challenges and Potential Solutions for BLM’s Wild Horse & Burro Program,”* (June 22, 2016), available at http://democrats-naturalresources.house.gov/imo/media/doc/testimony_norris1.pdf.

that relies upon the rangelands for survival, including both horses and burros and native wildlife. Overpopulation of horses and burros will eventually result in a situation of self-limitation, where resources can no longer support these feral populations.²¹ This will lead to starvation and dehydration, as witnessed during September 2015 in the Cold Creek Area in Nevada; critical emaciation and health conditions due to lack of forage led to an emergency gather.²²

In addition to representing an inhumane way of managing horse and burro populations, taking no management actions would also ignore the provision of the Wild Free-Roaming Horses and Burros Act of 1971 that requires maintaining a “thriving natural ecological balance” among horse and burro populations, domestic livestock, wildlife, and vegetation.²³ The Wildlife Society strongly encourages using humane lethal control on excess horses and burros as a way to ensure thriving, healthy herds and to minimize suffering of unwanted and unadoptable animals.

Conclusion

Without an increase in the rate of removal of horses and burros—to at least 15,000–20,000 per year in addition to adoption and fertility control efforts—populations of horses and burros will continue to expand and our nation will witness growing degradation of its ecologically important and unique rangeland ecosystems.

The Wildlife Society urges the Advisory Board to recognize the dire nature of ecological overpopulation of feral horses and burros by requesting that the USFS and BLM direct adequate attention and resources towards removing enough horses and burros from rangelands each year to conserve our ecologically diverse rangelands and measurably improve currently degraded areas.

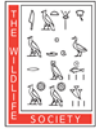
Thank you for considering the views of wildlife professionals. We invite your questions regarding this important issue. Please feel free to contact Keith Norris, Director of Wildlife Policy & Programs, at knorris@wildlife.org or (301) 897-9770 x309.

Enclosure – TWS Issue Statement: Feral Horses and Burros in North America

²¹ NAS, *supra* at 13.

²² BLM, *Cold Creek Area Wild Horse Emergency Care-Giving Gather*, Retrieved August 31, 2016, from http://www.blm.gov/nv/st/en/fo/lvfo/blm_programs/wild_horse_and_burro/Cold_Creek_Emergency_Wild_Horse_Gather.html.

²³ Wild Free-Roaming Horses and Burros Act of 1971, Pub. L. No. 92-195, § 3(a), *available at* <http://www.wildhorseandburro.blm.gov/92-195.htm>.



Issue Statement

Feral Horses and Burros in North America

Feral horses and burros are invasive species in North America. Exotic, non-native species are among the most widespread and serious threats to the integrity of native wildlife populations because they invade and degrade native ecosystems. When invasive species are perceived as a natural component of the environment, the general public may regard them as “natural,” not understanding the damages they inflict on native systems. These misperceptions create special challenges for wildlife managers. As a result, some groups advocate conservation and management of exotic species that promote their continued presence in landscapes where they are not native. Because these species are exotic, few policies and laws deal directly with their control. Feral horses (*Equus caballus*) and burros (*E. asinus*) that roam freely across western North America and along the Atlantic coast are examples of such species: they are iconic and beloved by some, but damage wildlife habitat and require improved and sustainable management practices. The numbers and impact of feral horses and burros can be difficult to control, amplifying their effects on native habitat and wildlife. In some cases, management of feral horses and burros and their effects divert resources (human and financial) from management of native species and habitat.

Feral horses and burros in North America are descendants of domestic horses and burros that either escaped from or were intentionally released by early European explorers and later settlers. Although many horse lineages evolved in North America, they went extinct in North America approximately 11,400 years ago during the Pleistocene, along with many other mammals. All horses and burros now present in North America are descendants of those domesticated in Eurasia and Africa (respectively) and were subjected to many generations of selective breeding (artificial selection) before they were introduced to North America by settlers. Since native North American horses went extinct, the western United States has become more arid and many of the horses' natural predators, such as the American lion and saber-toothed cat, have also gone extinct, notably changing the ecosystem and ecological roles horses and burros play.

Herds of feral horses and burros can damage the habitat they occupy. Estimates suggest that these herds range across more than 45 million acres in 10 American states and 2 Canadian provinces in western North America. Feral horses are also found in eastern North America on barrier islands off the coasts of Maryland, Virginia, Georgia, North Carolina, and Nova Scotia. Large herbivores (both native and non-native) disturb landscapes by trampling soils and vegetation, selectively grazing palatable plants, and altering the distribution of nutrients in the ecosystem. Research in the Great Basin has reported that areas inhabited by feral horses have fewer plant species and less grass, shrub, and overall plant cover than areas without horses, and more invasive plant species and weeds such as cheatgrass, an invasive species that degrades wildlife habitat. Riparian and wetland areas may also be impacted by feral horses and burros through soil compaction and increased erosion. The overall impact feral horses and burros have on any type of ecosystem depends on intensity and duration of use, timing, and the health and

resilience of the area. Where feral horse and burro density is high, lands are degraded, water resources are limited, and native species are already stressed, impacts can be substantial.

When feral horses and burros are introduced to an ecosystem, much of the native habitat is used by these non-native grazers. Free-ranging horses typically use higher elevations and steeper slopes than cattle, often moving to higher elevations for grazing, defense, and temperature control. Because of horses' flexible lips and long incisors, they are able to crop vegetation close to the soil surface, which can delay re-growth of grazed plants. The digestive systems of burros and horses dictate that they must ingest more forage per unit of body mass than any other large-bodied grazer in western North America. Feral horses are also dominant among native Great Basin ungulates in social interactions, notably at watering areas. There may not be aggressive behavior among horses, deer, and bighorn sheep (*Ovis canadensis*), but the presence of horses can affect the distribution of native species and their use of the habitat.

The diet of feral burros overlaps a great deal with that of bighorn sheep and uncontrolled burro populations have been predicted to lead to greater competition for forage and a decline in the populations of bighorn sheep and other native animals. Burros have one of the most-inclusive diets of large mammals. Given the climates that their ancestors inhabited, extant burros typically live in the hotter, drier ecosystems of North America. In those systems, rainfall is so scant that annual productivity is very low, and recovery from disturbance has been reported to require decades to centuries, depending on the type, intensity, and duration of the disturbance.

The small reptiles and mammals in the western North American ecoregion that depend on burrows and brush cover to survive and breed are lower in species diversity and less abundant in horse- and burro-occupied sites. These reptiles and mammals are an important component of the ecology of desert systems because they are a link in the food web, and perform numerous critical ecosystem functions (e.g. prey base, nutrient cycling, seed dispersal, insect control).

A variety of management practices have been in use since Congress passed the Wild Free-Roaming Horses and Burros Act in 1971, which guides management of feral horses and burros on Bureau of Land Management (BLM) and U.S. Forest Service lands in the western U.S. Existing management practices include: periodic population counts and rapid assessments of ecosystem status to determine where overpopulation exists; roundups to capture and transport animals; use of contraception to reduce productivity; adoption of animals to private owners; and the humane euthanasia of old, ailing, or unadoptable animals. However, management involving euthanasia, and sometimes roundups, is severely restricted by public opinion. While the public and interest groups express concern for the affected horses and burros, they often fail to consider the conservation of native plants and animals in the ecosystem, and the likelihood that horses and burros will die from starvation, thirst, and exposure when their numbers exceed the carrying capacity of the region.

Due to public opinion, animals passed over for adoption are not euthanized; instead, they are placed into short- or long-term holding facilities. The number of animals adopted annually has declined in recent years, necessitating additional holding facilities. In turn, program costs are rising to unsustainable levels and diverting funding that could be used to manage and sustain habitats for native wildlife. Sound, scientifically-based feral horse and burro management practices should be employed to conserve the highly sensitive arid and semiarid ecosystems of the West and keep taxpayer costs to an acceptable level.

The policy of The Wildlife Society regarding feral horses and burros is to:

1. Encourage the BLM and U.S. Forest Service to place primary emphasis upon the habitat needs of native wildlife and plants when developing, revising, and implementing herd management plans and to include wildlife biologists with differing areas of expertise on planning teams.
2. Encourage the U.S. Fish and Wildlife Service and National Park Service to remove feral horses and burros from all refuges and parks to protect wildlife and their habitat, historic and archaeological resources, and other trust values.
3. Encourage the BLM to eliminate feral horse and burro populations in Herd Areas that have been determined to have insufficient habitat resources necessary to sustain healthy horse populations.
4. Recommend that BLM and other responsible agencies direct adequate attention and resources toward accurately and precisely identifying the impacts of feral horses and burros on wildlife populations, habitats, and other natural resources managed for public benefit by 1) developing and implementing appropriate survey and removal methodology 2) conducting surveys and removals in a timely manner to minimize impacts on natural resources that can result from the overpopulation of feral horses and burros and 3) identifying and mitigating impacts on perennial and ephemeral riparian and wetland habitats, upland habitats, and threatened, endangered, and special status species of wildlife. Inventories should be performed using scientifically-based abundance estimation techniques that quantify population size and associated estimate error.
5. Support the use of roundups to remove feral horses and burros from rangeland while simultaneously seeking opportunities to improve the knowledge and use of the best and most humane capturing and handling methods.
6. Recognize that adoption programs are a socially acceptable method for removal and relocation of feral horses and burros, but that the pool of possible adopters is declining and adoption is not a viable long-term solution to overpopulation.
7. Support euthanasia as a humane method for removal of old, ailing, or unadoptable feral horses and burros and as a possible method to control population size.
8. Recognize that no feral horse or burro management plan should depend solely on fertility control given the uncertainty, logistical difficulty, and great expense that still exist regarding these methods.
9. Support increased funding for scientifically-defensible assessments of ecosystem conditions and interactions between feral horses and burros and native wildlife used to make decisions related to feral horses or burro management. Such assessments should consider the welfare of the feral horses and burros, and the ability of the system to conserve native plant and animal populations and provide ecosystem services such as clean air, clean water, and carbon sequestration.

10. Support the management of feral horses and burros at or below Acceptable Management Levels using a statistically valid sampling methodology. Underestimated populations can hinder management plans and lead to increased levels of resource damage.
11. Discourage the conversion of currently viable, ungrazed native or converted grasslands to pasture lands to house unadoptable horses and burros, privately or publically owned.
12. Cooperate with the conservation and animal-welfare communities to educate the public and key decision makers about the evolutionary history and ecological role of feral horses and burros and the negative impact they have on native vegetation and wildlife, including mammals, birds, reptiles, amphibians, and endangered species.

*The Wildlife Society's **Position Statement on Invasive and Feral Species** states that "land and resource management agencies should place primary emphasis upon management needs of indigenous wildlife and plants and resist efforts to sustain invasive and feral species on public or private lands" (TWS 2016).*