



THE WILDLIFE SOCIETY

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National Wild Horse & Burro
Advisory Board Meeting
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The Wildlife Society would like to thank the Advisory Board for the opportunity to provide comments today. The Wildlife Society was founded in 1937 and is a non-profit scientific and educational organization representing nearly 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 has encouraged improved feral horse management for several years and is a founding member of the National Horse and Burro Rangeland Management Coalition. As part of this diverse Coalition, we are focused on practical, common-sense, scientific-based solutions to horse and burro management concerns. We support the BLM's horse and burro program and its mission of managing for healthy herds on healthy ranges.¹

At the previous advisory board meeting in April, we expressed our concern that the BLM Horse and Burro Management program was not fulfilling its goals, and the intervening five months have not lessened our concern. Updated range estimates provided by the BLM show a sharp increase in horse and burro populations from over 40,000 in 2013 to over 49,000 in March 2014, well above the BLM's own management goal of under 27,000 individuals.²

The Wildlife Society is primarily concerned with the degrading effect overpopulated feral horse and burro herds have on native rangeland ecosystems. Research has shown these animals cause reductions in native plant species, increase invasive plants, out-compete native ungulates, and degrade water resources.

Horses and burros cut vegetation very close to the soil surface, lower than other ungulates on the range. This grazing technique damages the plant in a manner that stunts its re-growth³. Without proper recovery of the grazed plant, delicate riparian areas and native shrub and grass cover are diminished. Sparser vegetation leads to compacted soil and the spread of invasive plant species. Habitats used by native reptiles and small mammals are altered by the removal of native vegetation and the spread of non-native invasive plants. These species – which are essential to

¹ <http://www.blm.gov/wo/st/en/prog/whbprogram.html>, accessed on 7/31/2014

² http://www.blm.gov/wo/st/en/prog/whbprogram/history_and_facts/quick_facts.html, accessed on 7/31/2014

³ Beaver, E.A. (2003). Management implications of the ecology of free roaming horses in semi-arid ecosystems of the western United States. *Wildlife Society Bulletin* 31: 887-895

the overall ecosystem – become less abundant⁴, potentially altering food chain relationships and other key ecosystem linkages.

The aggressive behavior exhibited by feral horses excludes other ungulates, including elk and bighorn sheep, from grazing sites and watering holes⁵. Continued use of scarce water resources by feral horses limits access and availability to other wildlife and has the potential to negatively impact water quality by reducing riparian vegetation⁶.

The Greater Sage Grouse, a native bird species currently a candidate for listing under the Endangered Species Act is a particular concern. Nearly 10 million acres⁷ of Herd Management Areas overlap with greater sage grouse habitat. The ecosystem impacts of overpopulated horses and burros place this species at greater risk of further population declines.

The BLM planned to roundup less than 2,500 horses and burros this year. With the feral population expected to double in size every four to five years, corralling approximately 5% will not reduce populations to levels that prevent further degradation of the rangeland ecosystem. We strongly encourage the BLM to expand roundups for the protection of the ecosystem as a whole. The BLM can play a crucial role in leading conservation efforts for greater sage grouse and the whole rangeland ecosystem by reducing the risks to native species caused by overpopulated horses and burros.

We recognize the BLM is currently over-burdened with caring for horses in holding pens and other facilities which are nearing their approximately 52,000 animal capacities with costs continuing to rise². We, along with several other organizations, have urged Congress to remove the restrictions it has placed on the methods allowed by the Wild Free-Roaming Horse and Burro Act to appropriately manage herds and ultimately reduce the growing burden on the BLM and U.S. taxpayers. If this occurs, we urge the BLM to fully utilize the authorized powers to bring horse and burro populations to levels that protect native ranges and the health of the horses and burros.

We empathize with and support the desire for the well-being and humane treatment of these horses and believe the current overpopulation results in poor conditions for horses and burros on the range. We urge appropriate actions be taken to assure that one nonnative species is not overly protected at the expense of a healthy range. The overpopulation has had, and will continue to have dire consequences for native wildlife, plants, and ecosystem services if allowed to grow unchecked.

We ask the Advisory Board to recognize the ecological risks associated with the current overpopulation of feral horses and to encourage the BLM to respond with all appropriate and necessary actions to reduce feral horse and burro populations to manageable and healthy levels.

⁴ Beever, E.A., and P.F. Brussard. (2004). Community- and landscape-level responses of reptiles and small mammals to feral-horse grazing in the Great Basin. *Journal of Arid Environments* 59:271-297

⁵ Osterman-Kelm, S., E.R. Atwill, E.S. Rubin, M.C. Joregensen, and W.M. Boyce. (2008). Interactions between feral horses and desert bighorn sheep at water, *Journal of Mammalogy* 89: 459-466

⁶ Beever E.A., and P.F. Brussard. (2000) Examining ecological consequences of feral horse grazing using exclosures. *Western North American Naturalist* 60: 236-254.

⁷ BLM presentation given at the April 2012 Wild Horse and Burro Advisory Board meeting