



NATIONAL HORSE & BURRO RANGELAND MANAGEMENT COALITION

*Advocating for commonsense, ecologically-sound approaches to managing horses and burros
to promote healthy wildlife and rangelands for future generations*

DATE: 22 April 2015

TO: National Wild Horse & Burro Advisory Board

RE: Public testimony calling for the BLM to manage horses & burros at Appropriate Management Levels to protect the rangeland ecosystem

FROM: National Horse & Burro Rangeland Management Coalition
Keith Norris, Chair, keith.norris@wildlife.org, 301-897-9770 x 309

The National Horse & Burro Rangeland Management Coalition appreciates the opportunity to submit testimony to the National Wild Horse & Burro Advisory Board. The National Horse & Burro Rangeland Management Coalition includes a wide range of sportsmen's, livestock, wildlife, and land conservation organizations and professional societies. Collectively, we represent millions of Americans and focus on commonsense, ecologically-sound approaches to managing horses and burros to promote healthy wildlife and rangelands for future generations.

Healthy Rangelands

Our Coalition prioritizes the health of the public's rangelands above all other considerations. ***Healthy rangelands are where native wildlife can thrive, livestock can graze and support local ranchers, free-ranging horses and burros can live successfully, and water quality can be sustained.*** Healthy rangelands can rebound from any disturbance naturally, and in a timely manner; habitat quality is sustained and natural growth processes are enabled. Healthy rangelands are critical to the future of the Western way of life.

The current overpopulation of horses and burros is degrading the health of our rangelands, and the growth of horse and burro populations has the potential to continue to damage our rangelands beyond their ability to recover.

Horses and burros are known to compact rangeland soils and graze vegetation extremely low to the ground, reducing the plant's ability to re-grow. The extreme grazing of native vegetation and compaction of soils can result in desertification of the range, particularly in the current drought situations being experienced in the West.

Horses and burros compete with native wildlife for resources and impact habitat conditions for those species. Over 30% of Herd Management Areas (9.9 million acres) overlap with Greater Sage-Grouse habitat. The impact of horses and burros on sage-grouse habitat is potentially thwarting efforts to conserve this species and prevent its listing on the Endangered Species Act.

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Masters of Foxhounds Association • Mule Deer Foundation • National Association of Conservation Districts

National Cattlemen's Beef Association • National Rifle Association • National Wildlife Refuge Association

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Our coalition is greatly concerned about the exponentially growing population of wild horses and burros on our nation's rangelands and the lack of effort by the BLM to reduce the threat this poses to our nation's rangelands.

Population Increases & Lack of BLM Effort to Manage

As of March 1, 2014, wild horse and burro populations surpassed 49,000 animals on BLM-rangelands. This threshold exceeds the BLM estimated ecologically-sustainable level of 26,684 horses and burros by more than 22,000. With the documented potential for 20% annual population increase, there are likely more than 58,000 animals currently on the range – that means that wild horses and burros on our nation's rangelands already exceed capacity by 117% for appropriate range management.

This extreme level of overpopulation by an invasive species negatively impacts the country's rangelands, risking the future of the ecosystem. By continuing to allow horses and burros to exceed sustainable levels, the BLM is placing in jeopardy the future of wildlife, rangelands, livestock operations, and the horses and burros themselves.

The focus of the BLM Wild Horse & Burro program should revert to its original purpose and stated goal of achieving appropriate management levels (AML). Direct removal of horses and burros from impacted regions will aid in AMLs being achieved while simultaneously reducing their impact on the supporting ecosystem.

The FY 2015 Budget and the President's FY 2016 Budget Proposal plan for the removal of only 2,000 horses and burros from the country's rangelands each year. Unfortunately, this number of removals does very little to protect our nation's rangelands from the growing negative impacts of overpopulated horses and burros.

Wild horse populations typically grow by 20% per year and double in size every 4-5 years. At the current rate, the wild horse population will likely grow by 9,000 animals in 2015, even with the planned removal of 2,000 horses. As a result, we could see as many as 67,000 wild horses and burros degrading the country's rangelands by 2016 – exceeding capacity by 150% for appropriate rangeland management. This is an unacceptable rate of increase for a population that already greatly exceeds AMLs. Such population numbers will continue to cause an unacceptable level of damage to a valuable asset for our country.

We appreciate the BLM's increased attention to fertility control methods, as we believe that scientifically-based use of fertility control (*e.g.*, proven to be effective and safe) can be an important component to the solution to this problem. However, fertility control alone does not solve the problem and should not be the primary approach. There are currently Herd Management Areas (HMA) more than 500% over AML. Fertility control methods, if they are

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effective in reducing pregnancies, will only help maintain population levels in the short term, not reduce them. Direct removal of excess wild horses and burros from the range is the only way to achieve AMLs in a reasonable amount of time.

Horses vs. Livestock

Some groups wish to argue that we should remove all livestock from the range, and doing so would allow horse and burro populations to remain. However, we oppose this perspective. Livestock impact our public rangelands very differently than horses. Livestock do not forage vegetation as low to the ground as horses do, and do not act as aggressively toward wildlife. Most importantly, livestock are managed by the BLM and their grazing allotments can be – and regularly are – adjusted to prevent damage to the rangelands based on changes in habitat and environmental conditions.

Even without any livestock on rangelands, the horse and burro management situation would be unsustainable. Horses and burros have very few natural predators that overlap their range. As a result, we would still face a situation where the BLM would need to manage the horses and burros to protect the range and prevent self-limitation of the populations via starvation and dehydration. (See enclosures)

Preservation and Humane Treatment of Horses and Burros

We are not advocating for the removal of all horses and burros from our country's public rangelands. We recognize that these animals, although not native, are protected by federal law and are an iconic species of the West. We believe they can and should be a part of the multiple-use mandate of the BLM. However, continuing down this path of overpopulation is detrimental to everything that relies upon the rangelands to survive – including the horses, native wildlife, and people. The health of the rangeland must be the top priority in order for everything else that depends on the rangelands to survive and flourish.

Overpopulation of the horses and burros will ultimately result in a situation of self-limitation. The horses and burros will degrade the habitats and deplete resources to the point where the population will face starvation and dehydration. The ongoing extreme drought situation through much of the West is turning this potential situation into a reality. The current approach is an irresponsible and inhumane way to manage wild horses and burros. We can correct this situation by removing excess animals from the rangelands and managing wild horse and burro populations in balance with the rangeland ecosystem – at AMLs.

Conclusion – Increase Rate of Removals

Without an increase in the rate of removal of horses and burros – to the order of 10,000-12,000 per year in addition to fertility control efforts - populations will continue to expand and our nation will witness growing degradation to its rangeland ecosystem.

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We urge this Advisory Board to recognize the dire situation and address this increasing problem for our nation's valuable rangelands by encouraging the BLM to remove horses at a rate substantial enough to produce impactful results and protect our natural resources.

Thank you for considering the input of our coalition. We invite your questions regarding this issue. Please feel free to contact our current Chair, Keith Norris at keith.norris@wildlife.org or 301-897-9770 x 309.

Enclosed: Figure "Removals, Adoptions, On-Range and Off-Range Populations"
 Figure "On-range population growth"

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Removals, Adoptions, On-Range and Off-Range Populations

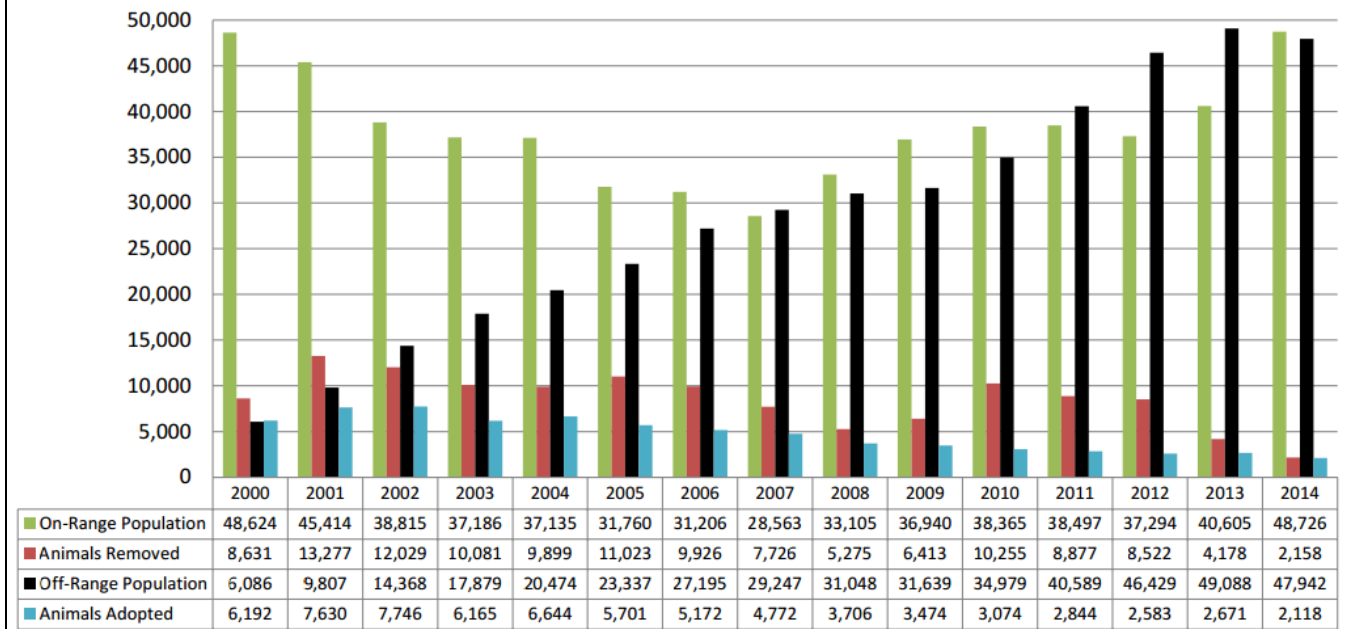


Figure provided by the BLM Wild Horse & Burro Program

The BLM's attempts to appropriately manage the wild horse and burro populations in balance with other rangeland uses were nearly successful from 2000-2007. The agency was removing >7,000 each year, and reducing the on-range population in order to achieve Appropriate Management Level of approximately 26,600 animals.

Unfortunately, the program began to fail in 2008. After 7 subsequent years of population reduction, the horse and burro on-range population began to grow – and hasn't stopped, due to the reduced efforts by the BLM to remove horses. The BLM is now removing only ~2,000 animals per year.

In 2014, the nation found itself back with nearly the same on-range population it had in 2000 – the only change is now the taxpayer has to support 40,000+ more horses and burros in off-range holding facilities.

The rate of animals being adopted-out is not keeping up with the growth of the population. Only ~2,000 horses are being adopted each year, while the population is growing by ~10,000 horses each year. Adopting animals is clearly not going to solve the problem.

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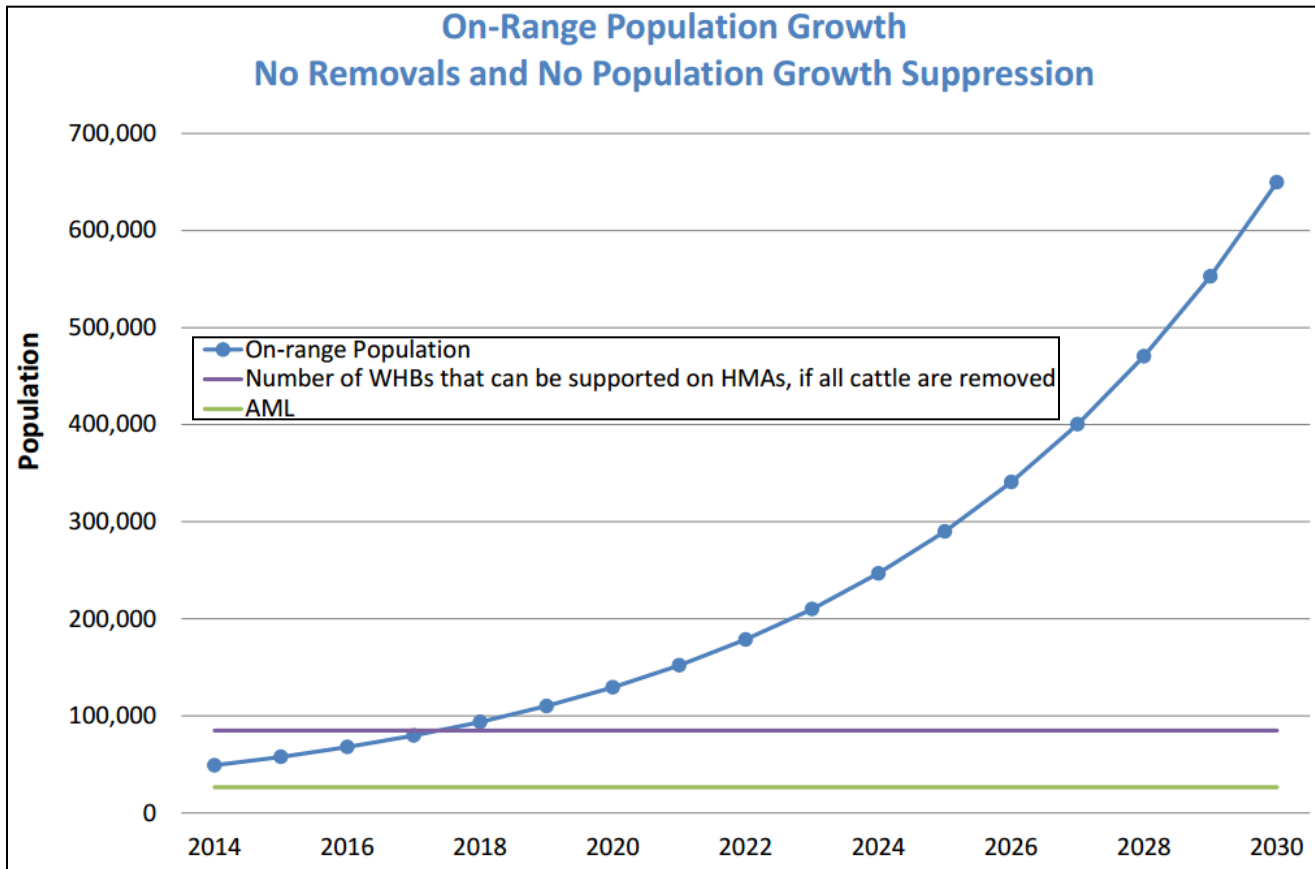


Figure provided by the BLM Wild Horse & Burro Program

Horse and burro populations are growing at an exponential rate of approximately 20% per year, and already exceed Appropriate Management Levels (AML) by approximately 30,000 animals (56,000+ vs. 26,600+ AML).

This issue is not solved by a hypothetical situation in which all cattle and other livestock are removed from the rangelands. Livestock, which are managed closely by the BLM, are an appropriate use of our nation's rangelands. Even if all of the livestock were removed, the rangelands could only support ~85,000 horses and burros – a figure we are quickly approaching due to the lack of appropriate management actions by the BLM.

Horses and burros must be appropriately managed – for the good of the rangeland and the good of the horses and burros themselves. If they continue to surpass AML, they will degrade the health of the rangelands and come to a point of “self-limitation” – this will involve horses and burros starving to death and dying of dehydration due to a lack of resources to support the population. This situation is already occurring on some areas of the rangelands.