

TWS Comments Wild Horse and Burro

My name is Megan Berman and on behalf of The Wildlife Society I would like to thank the Advisory Board for the opportunity to comment today. The Wildlife Society (TWS) was founded in 1937 and is a non-profit scientific and educational association representing nearly 22,000 professional wildlife biologists, managers, and affiliates dedicated to excellence in wildlife stewardship through science and education. Our mission is to represent and serve the professional community of scientists, managers, educators, technicians, planners, and others who work actively to study, manage, and conserve wildlife and its habitats worldwide.

TWS is an active member of a larger, diverse coalition, the National Horse & Burro Rangeland Management Coalition. Since becoming a founding member in 2012, TWS has continued to be an advocate for science-based management of feral horses and burros. Although some consider horses and burros iconic species of western North America, they damage wildlife habitat and require improved and sustainable management practices. Horses and burros are invasive, non-native species that seriously threaten native wildlife populations because they overrun and degrade ecosystems.

Research in the Great Basin has reported that rangelands with high densities of feral horses and burros have fewer plants, grasses and shrub species and more invasive plants and weeds. These changes to the natural environment degrade the land, limit water resources and lower the diversity of native species. Healthy populations of small reptiles, imperiled grassland birds, and migratory mammals like pronghorn and big horn sheep are critical components of our rangeland ecosystems and are fundamental in maintaining a thriving natural ecological balance. The National Academies of Science (NAS) report discusses using science as a tool for managing feral horse and burro populations, but does not mention the effects of interspecific competition on native wildlife, euthanasia as a population control mechanism, or the side-bars placed on BLM by federal policies and mandates. The report does mention the vague terminology included in the Act and in BLM policies, but does not provide recommendations for interpretation. These are important factors to consider when discussing management of horses and burros, and while they are not evaluated in the report, they are still a viable concern and should be taken into account. BLM is required to manage for healthy horses and healthy rangelands while upholding their multiple use mandates, a goal that is difficult to achieve with extreme overpopulation.

TWS believes sound, scientifically-based management practices should be employed to conserve the highly sensitive arid and semiarid ecosystems of the west. Our policy regarding feral horses and burros is to place primary emphasis upon habitat needs of native wildlife and plants, encourage BLM to eliminate feral horse and burro populations in Herd Areas that have insufficient habitat resources, and recommend responsible agencies direct their attention and resources to identifying the impacts of feral horses and burros on wildlife populations, habitats and other natural resources. Additionally, TWS supports the use of roundups to remove feral horses and burros from rangelands, as well as euthanasia as a humane method for the removal of old, ailing or unadoptable horses and burros. We recognize that adoption programs are a socially acceptable method for dealing with excess animals but should not be the only method, and that no management plan should depend solely on fertility control. Educating the public and key decision makers about the ecological role of horses and burros, and the impacts they have on

native vegetation and wildlife is vital to ensuring the success of BLM's Wild Horse and Burro Program.

The Wildlife Society thanks the Advisory Board for providing a forum for public comment, and looks forward to working with the Board in the future to address this growing problem.