



THE WILDLIFE SOCIETY

Leaders in Wildlife Science, Management and Conservation

National Wild Horse & Burro
Advisory Board Meeting
Elko, Nevada
September 8–9, 2016

Contact: Keith Norris, AWB®
Director of Government Affairs & Partnerships
The Wildlife Society
keith.norris@wildlife.org, 301.897.9770 x309

The Wildlife Society would like to thank the Advisory Board for the opportunity to provide comments today. The Wildlife Society, founded in 1937, represents 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 supports 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 over current horse and burro management options and the ability of those options to fulfill the Program's mission. The continued overpopulation of 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 wildlife and rangelands for future generations.

As a result, The Wildlife Society urges the Advisory Board to recognize the dire nature of wild horse and burro overpopulation by requesting that the U.S. Forest Service and BLM direct adequate attention and resources towards removing excess wild horses and burros from rangelands at a rate substantial enough to produce impactful results and protect our ecologically diverse rangelands from further degradation.

Bureau of Land Management

BLM has established an on-range Appropriate Management Level (AML) of 26,715 wild horses and burros.² An AML describes the optimum number of wild 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, 2016, BLM estimates that on-range wild horse and burro populations exceed 67,000—two and a half times greater than 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 could surpass 80,000 as

¹ BLM, *Wild Horse and Burro Program*. Retrieved August 31, 2016, from http://www.blm.gov/style/medialib/blm/wo/Planning_and_Renewable_Resources/wild_horses_and_burros/statistics_and_maps/infographic.Par.82953.File.dat/WHBhandout051216.pdf.

² BLM, *Wild Horse and Burro Quick Facts*. Retrieved August 31, 2016, from http://www.blm.gov/wo/st/en/prog/whbprogram/history_and_facts/quick_facts.html.

³ *Dahl v. Clark*, 600 F. Supp. 585, 592 (1984); 109 IBLA 112, 119 (1989); Appropriate Management Level. Retrieved August 31, 2016, from http://www.blm.gov/nv/st/en/prog/wh_b/appropriate_management.html.

⁴ Quick Facts, *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.

early as 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 years.⁶

U.S. Forest Service

The U.S. Forest Service also manages wild horse and burro populations across 37 Herd Territories.⁷ As of February 2014, the Forest Service 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 9,000—more than four times greater than AML.

Recommendations

The overpopulation of horses and burros on public lands has directly contributed to the degradation of rangeland ecosystems while hampering 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.

In the past, the removal of excess horses and burros through gathers helped to maintain the ecological health of rangelands.¹⁰ However, sharp declines in adoption rates, combined with restrictions on the use of 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.¹¹ 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.¹²

In 2017, BLM estimates that it will only remove approximately 2,500–3,000 horses and burros from the range.¹³ With an on-range population increase of 8,877 horses and burros between 2015 and 2016, corralling less than 4% of the on-range population **will not** reduce the population to levels that prevent the continued and further degradation of our rangeland ecosystem. In fact, only five times in the 45 year history of the Wild Horse and Burro Program has the number of

⁶ NAS, *supra* at 13.

⁷ USFS, *Wild Horse and Burro Program*. Retrieved August 31, 2016, from <http://www.fs.fed.us/rangelands/ecology/wildhorseburro/>.

⁸ USFS, *US Forest Service Wild Horse and Burro Territories*. Retrieved August 31, 2016, from <http://www.fs.fed.us/rangelands/ecology/wildhorseburro/documents/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.uwyo.edu/law/directory/files/donahue.pdf>.

¹⁰ 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>.

¹¹ Quick Facts, *supra*.

¹² 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.

¹³ *Id.*

annual horse and burro adoptions ever matched or exceeded the level of population growth experienced last year (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 2,631 horses and burros in FY 2015.¹⁵ While adoptions represent the most socially acceptable method of relocating horses off the range, it fails to provide a viable long-term solution. Even if adoptions increase back to their maximum historic level, it would still only account for annual population growth, and would not significantly reduce 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; but The Wildlife Society has concerns about the 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 in order to protect the rangeland ecosystem from further degradation.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 support full utilization of *all* authorized powers to bring horse and burro populations to levels that protect native rangeland ecosystems and the health of on-range horses and burros.

¹⁴ 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.

¹⁵ *Id.*; Quick Facts, *supra*.

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/56292/75587/83699/Finding_of_No_Significant_Impact_-_May_2016.pdf.

¹⁸ Bartholow, *supra*; BLM, *Fertility Control*, Retrieved August 31, 2016, from http://www.blm.gov/wo/st/en/prog/whbprogram/science_and_research/fertility_control.html.

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.

The Wildlife Society supports the desire for the well-being and humane treatment of wild horses and burros in all management actions.²¹ We also recognize that taking no action with regards to on-range horse and burro populations represents one possible management technique. However, continuing to follow this path will almost certainly result in detrimental effects to everything that relies upon the rangelands for survival, including the horses and burros. Overpopulation of horses and burros will eventually result in a situation of self-limitation, where resources can no longer support the animals.²² 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.²³

In addition to representing an inhumane way of managing wild 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 wild horse and burro populations, domestic livestock, wildlife, and vegetation.²⁴ The Wildlife Society strongly encourages the use of humane euthanasia on excess wild horses and burros (if present appropriations restrictions are removed) 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 the order of 10,000–12,000 per year in addition to adoption and fertility control efforts—populations of wild horses and burros will continue to expand and our nation will witness growing degradation to its rangeland ecosystem.

As a result, The Wildlife Society urges the Advisory Board to recognize the dire nature of wild horse and burro overpopulation by requesting that the U.S. Forest Service and BLM direct adequate attention and resources towards removing excess wild horses and burros from rangelands at a rate substantial enough to produce impactful results and protect our ecologically diverse rangelands from further degradation.

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 Government Affairs, at knorris@wildlife.org or (301) 897-9770 x309.

Enclosure – Final Position Statement: Feral Horses and Burros in North America

²¹ The Wildlife Society, *Standing Position Statement: Animal Rights Philosophy and Wildlife Conservation*, Retrieved August 31, 2016, from http://wildlife.org/wp-content/uploads/2016/04/SP_AnimalRights.pdf.

²² NAS, *supra* at 13.

²³ 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.

²⁴ 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>.