



# THE WILDLIFE SOCIETY

Leaders in Wildlife Science, Management and Conservation

National Wild Horse & Burro  
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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 an international non-profit scientific and educational organization representing nearly 10,000 professional wildlife biologists and managers. 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.<sup>1</sup> 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.

***The Wildlife Society urges the Advisory Board to recognize the dire nature of wild horse and burro overpopulation and request that the U.S. Forest Service and BLM provide rangeland managers with the tools necessary to remove excess wild horses and burros from rangelands at a rate substantial enough to produce effective 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. 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. Range estimates provided by BLM indicate over 58,000 horses and burros roamed on our public rangelands as of March 2015. With an estimated annual population growth rate of 20%, combined with a low number of range removals, current horse and burro populations have likely now surpassed 66,000—roughly two and a half times greater than AML.<sup>2</sup> In the absence of new management options by BLM, we could see horse and burro populations double in just four years.<sup>3</sup>

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

<sup>2</sup> [http://www.blm.gov/wo/st/en/prog/whbprogram/history\\_and\\_facts/quick\\_facts.print.html](http://www.blm.gov/wo/st/en/prog/whbprogram/history_and_facts/quick_facts.print.html) accessed on 3/25/16

<sup>3</sup> [http://www.blm.gov/wo/st/en/info/newsroom/2015/july/nr\\_07\\_07\\_2015.html](http://www.blm.gov/wo/st/en/info/newsroom/2015/july/nr_07_07_2015.html) accessed on 8/3/2015

## **U.S. Forest Service**

The U.S. Forest Service also manages wild horse and burro populations across 37 Herd Territories.<sup>5</sup> As of February 2014, the Forest Service estimates that 7,400 horses and burros inhabited Forest Service Herd Territories, which have an AML of 2,250 animals. Based on annual population growth estimates and minimal use of population control measures, current populations likely now exceed 10,000—approximately four and a half times greater than AML.

## **Recommendations**

As expressed in The Wildlife Society’s Final Position Statement on Feral Horses and Burros in North America, The Wildlife Society views horses and burros in North America as an exotic, non-native species that threatens the integrity of native wildlife populations through degradation of native ecosystems. Accordingly, 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. For these reasons, The Wildlife Society encourages the Advisory Board to support and prioritize science-based management solutions that can 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. However, restrictions on the use of humane euthanasia and sale of gathered horses, combined with sharp declines in adoption rates, have led to nearly 50,000 horses and burros living in off-range holding facilities at a cost of approximately \$50 million per year. With limits to the amount of horses and burros off-range holding facilities can accommodate, BLM now only removes as many horses as can be adopted.<sup>2</sup>

As a result, the Obama Administration has tentatively called for the removal of only 2,000 horses from BLM rangelands in 2016.<sup>4</sup> With a population increase of 8,941 horses and burros last year (18%), corralling approximately 3% of the on-range population ***will not reduce the population*** to levels that prevent the continued degradation of our rangeland ecosystem.

While adoptions represent the most socially acceptable method of relocating horses off the range, it fails to provide a viable long-term solution. In fact, just once in the past 20 years (1997) has the number of horse adoptions matched the level of population increase from last year, and since then, annual adoption rates have declined by nearly 75%—only 2,631 horses and burros were adopted into private care in FY 2015.<sup>6</sup> Even if adoptions increase back to their maximum historic level, it would still only cover annual population growth, and would not 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 have concerns about the effectiveness of fertility control methods in curbing wild horse and burro population growth rates. As expressed in our Standing Position Statement on the use of Wildlife Fertility Control, current logistical difficulties and financial barriers in widespread implantation of fertility control makes it unrealistic to assume that

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<sup>4</sup> [http://www.doi.gov/budget/appropriations/2016/upload/FY2016\\_BLM\\_Greenbook.pdf](http://www.doi.gov/budget/appropriations/2016/upload/FY2016_BLM_Greenbook.pdf) accessed on 8/3/2015

<sup>5</sup> <http://www.fs.fed.us/rangelands/ecology/wildhorseburro//territories/index.shtml> accessed on 3/28/2016

<sup>6</sup> [http://www.blm.gov/wo/st/en/prog/whbprogram/herd\\_management/Data.html](http://www.blm.gov/wo/st/en/prog/whbprogram/herd_management/Data.html) accessed on 3/31/16

fertility-based control measures will reduce the need to remove animals from public lands in the near future. With regard to ongoing population growth suppression research, we support the development of spay and neuter programs<sup>7</sup> over the currently available fertility vaccine, *porcine zona pellucida* (PZP), which has proven unsuccessful as a long-term solution due to its short-lived effectiveness (up to 22 months).<sup>2</sup> 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.

We recognize that BLM is currently over-burdened, both financially and logistically, with caring for excess horses and burros in off-range holding facilities.<sup>2</sup> The Wildlife Society, along with the National Horse and Burro Management Coalition, have urged Congress to remove 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 BLM and U.S. taxpayers. 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.

The Wildlife Society empathizes with and supports the desire for the well-being and humane treatment of wild horses and burros in all management actions, as consistent with our Standing Position Statement on Animal Rights in Wildlife Conservation. 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; leading to starvation and dehydration like that witnessed during the September 2015 Cold Creek Area emergency gather in Nevada as a result of critical emaciation and health conditions due to lack of forage. In addition to representing an inhumane way of managing wild horse and burro populations, taking no management actions would also ignore the provisions of the 1971 Wild Free-Roaming Horses and Burros Act that requires a thriving natural ecological balance among wild horse and burro populations, domestic livestock, wildlife and vegetation. As a result, The Wildlife Society strongly encourages the use of humane euthanasia on excess horses as a way to ensure thriving, healthy herds and to minimize suffering on unwanted and unadoptable wild horses and burros.

### **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.

***The Wildlife Society urges the Advisory Board to recognize the dire nature of wild horse and burro overpopulation and request that the U.S. Forest Service and BLM provide rangeland managers with the tools necessary to remove excess wild horses and burros from rangelands at a rate substantial enough to produce effective results and protect our ecologically diverse rangelands from further degradation.***

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<sup>7</sup> [http://www.blm.gov/wo/st/en/prog/whbprogram/science\\_and\\_research/usgs\\_partnership.html](http://www.blm.gov/wo/st/en/prog/whbprogram/science_and_research/usgs_partnership.html) accessed on 3/25/16

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](mailto:knorris@wildlife.org) or (301) 897-9770 x 309.