THE WILDLIFE SOCIETY

Leaders in Wildlife Science, Management and Conservation

National Wild Horse & Burro
Advisory Board Meeting
Columbus, Ohio
April 22-23, 2015

Contact: Keith Norris, AWB®
Assistant Director of Government Affairs
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 was founded in 1937 and is a non-profit scientific and educational organization representing nearly 9,000 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 improvements to 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 previous advisory board meetings, we expressed our concerns that the BLM Horse and Burro Management program was not fulfilling its goals, and the intervening time has not lessened our concern. Range estimates provided by the BLM indicate over 49,000 horses and burros roamed on our public rangelands as of March 2014. Given the known potential for a 20% increase in horse and burro populations and the general lack of management by the BLM, it is reasonable to assume this population now exceeds 56,000 individuals, which is well above the BLM's own management goal of under 27,000 individuals.[2]

The BLM has been consistently reducing its efforts in removing horses from the rangelands, removing only ~2,100 in 2014 and ~2,500 in 2015; they plan to only remove 2,000 in 2016. With the population expected to double in size every four to five years, corralling approximately 3% of all feral animals will not reduce the population to levels that prevent further degradation of the rangeland ecosystem. We strongly encourage the BLM to expand removals for the protection of the ecosystem. The BLM can play a crucial role in leading conservation efforts for greater sage grouse and the whole rangeland ecosystem by reducing risks to native species caused by overpopulated horses and burros.

Wildlife professionals are hampered in their efforts to sustainably manage and conserve native wildlife by overpopulated horses and burros that are damaging habitats. Efforts to manage and conserve public trust wildlife resources are thwarted by an ever-expanding population of a non-native invasive species.

The Wildlife Society is primarily concerned with the degrading of native rangeland ecosystems caused by overpopulated feral horse and burro herds. Research has shown these animals cause

[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

reductions in native plant species, increase invasive plants, out-compete native ungulates, and degrade water resources

Horses and burros cut vegetation lower than other ungulates on the range. This grazing technique, which is very close to the soil surface, damages the plant in a manner that stunts its re-growth[3]. 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. Removal of native vegetation and spread of non-native invasive plants alters habitats used by native reptiles, small mammals, and other wildlife. These species – which are essential to the overall ecosystem – become less abundant[4], altering food chain relationships and other key ecosystem linkages.

Additionally, aggressive behavior exhibited by feral horses excludes other ungulates, including elk and bighorn sheep, from grazing sites and watering holes[5]. 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 vegetation[6]. This is growing concern given the ongoing drought situation throughout much of the West.

The Greater Sage Grouse, a native bird species currently a candidate for listing under the Endangered Species Act, may be particularly affected by rangeland degradation by feral horse and burro populations as well. Nearly 10 million acres[7] 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 and the need for listing on the Endangered Species Act

We support the ongoing efforts and implementation of recommendations by the National Academy of Science on feral horse and burro management. We support the scientifically-defensible assessments of feral horse and burro populations on ecosystem conditions. We hope development of a Programmatic Environmental Impact Statement and use of survey and focus group methodologies on public valuation of management decisions will contribute to the advancement of the program.

We also encourage the expeditious completion of research on population growth suppression methods. However, given fertility controls' current logistical difficulties and financial barriers in widespread implantation along with an uncertainty in effectiveness of reducing populations, we stress that fertility control alone is not a viable solution to achieve results within the necessary timeframe to prevent future range degradation and to protect native wildlife that rely upon it.

---

[3] Beever, 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

[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

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 rise[2]. 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. Appropriate management of feral horse and burro population better enables the BLM to maintain healthy rangeland ecosystems, supporting native wildlife populations and public trust resources.