

Mr. Neil Kornze, Director  
Bureau of Land Management  
1849 C Street NW, Rm. 5665  
Washington DC 20240

Mr. Dean Bolstad  
Division Chief, Wild Horse and Burro Program  
Bureau of Land Management  
1849 C Street NW, Rm. 5665  
Washington DC 20240

RE: Owyhee Complex Roundup, November 2016

Dear Mr. Kornze and Mr. Bolstad,

The undersigned are members of a group of individuals and organizations that have been working during the past year to develop a viable plan for management of wild horses. In light of our discussions, we are requesting that the Bureau of Land Management alter its current management plan for the Owyhee Complex, set to begin in November 2016 to more fully encompass a fertility control program to be implemented in conjunction with the scheduled removal of horses.

Previous management actions in the Owyhee Complex have not been effective at controlling horse populations in this ecologically sensitive area that is critical habitat for sage grouse. In FY2010, the Owyhee Complex populations were estimated at 1,548 horses, well over management objectives.<sup>1</sup> BLM gathered 1,224 horses (79%), removed 1,097 horses, and applied PZP to 64 mares that were returned to the range.<sup>2</sup> In FY2013, the population in the complex was estimated at 2,252 horses, more than double the management objectives.<sup>3</sup> BLM again conducted a gather, collected 1,011 animals (45%), removed 871 horses, and treated 46 mares with PZP before returning them to the range.<sup>4</sup> Post-gather population estimates were 1,427 horses.<sup>5</sup>

In both FY2010 and FY2013, BLM treated all mares gathered and released with PZP. However, this represented less than 30% of the mares that remained on the range in 2010, and less than 7% in the FY2013 gather, far below the level of fertility control application needed to sufficiently reduce population growth.<sup>6,7</sup>

As a result, populations in the Owyhee Complex remain well above management objectives. This is because regularly removing horses reduces the impact of density-dependent population responses, and

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<sup>1</sup> "Completed FY10 Gathers" BLM.

[http://www.blm.gov/style/medialib/blm/wo/Planning\\_and\\_Renewable\\_Resources/wild\\_horses\\_and\\_burros/statistics\\_and\\_maps/transparency\\_page.Par.95462.File.dat/Completed%20FY%2010%20Gathers.pdf](http://www.blm.gov/style/medialib/blm/wo/Planning_and_Renewable_Resources/wild_horses_and_burros/statistics_and_maps/transparency_page.Par.95462.File.dat/Completed%20FY%2010%20Gathers.pdf)

<sup>2</sup> *Id.*

<sup>3</sup> Owyhee Complex Herd Management Area Gather Environmental Assessment, DOI-BLM-NV-W010-2010-055-EA pg 3.

<sup>4</sup> See [http://www.blm.gov/wo/st/en/prog/whbprogram/herd\\_management/Data/Completed\\_FY\\_2013\\_Gathers.html](http://www.blm.gov/wo/st/en/prog/whbprogram/herd_management/Data/Completed_FY_2013_Gathers.html)

<sup>5</sup> Calculated based on pre-gather population of 2,252 horses, minus 871 removed, plus 46 mares returned to the range.

<sup>6</sup> Assumes a 50:50 male to female sex ratio of on-range populations post-gather.

<sup>7</sup> Of note, several of BLM's reports and official documents regarding both the FY2010 and FY2013 gathers provide inconsistent data on the numbers of horses gathered, removed, treated with PZP, or returned to the range. These numbers are our best attempt to produce accurate information out of BLM's reports.

allows for compensatory breeding- creating a higher than normal foaling rate.<sup>8</sup> In order to prevent this, the agency must regularly treat a significant portion (>80%) of the remaining horses on the range with fertility control to prevent subsequent population growth. This requires gathering as close to 100% of the population as possible, treating all mares returned to the range with PZP, and continuing to treat mares in the complex in successive years to ensure that a sufficient number of mares (>80%) are treated.

The agency's past lack of effort to treat a significant portion of the area's remaining mares with fertility control has predictably led to high population growth and a situation in which large scale removals have been and will continue to be necessary.

As things currently stand, the Owyhee Complex is significantly over AML, with an estimated population of 3,067 and an AML of 779, which has created political conflict, and likely has long-term ecological ramifications. If the BLM continues managing the Owyhee Complex in the same way it has been doing since 2010, the agency is all but guaranteeing high population growth rates within the Complex, and a need for future large scale gathers that the agency has acknowledged they do not have the financial capacity to conduct.

We would like assurances from the agency that this gather will be different. In order to successfully maintain this complex close to AML, the agency must capture as close to 100% of the population as possible, remove as many excess horses as capacity allows, and treat all captured mares not removed and placed back on the range with PZP. For any mares not gathered, the agency must implement on-the-ground programs to ensure that additional mares are treated with PZP. The agency should not proceed with gathers that result in a population still above AML, with only a small fraction of remaining mares treated with PZP if they hope to obtain ecologically-sustainable populations. The agency must then continue to treat mares in successive years to ensure an appropriate number of mares (i.e. >80%) in the population is treated to keep population growth rates low, until such time that a more permanent solution to population management is available.

We understand that this approach requires the agency to make a financial commitment to the Owyhee Complex. However, failure to take any additional action will simply compound the situation by allowing the HMA population to continue to grow unchecked. Because of this, we strongly urge the agency to treat all remaining mares on the HMA to slow the HMA's foaling rates.

We are requesting a response from the agency prior to the beginning of the roundup. Please address the response to Gillian Lyons, at The Humane Society of the United States, 700 Professional Drive, Gaithersburg, MD 20879, and Keith Norris, at The Wildlife Society, 425 Barlow Place Suite 200, Bethesda, MD 20814, who will disseminate the reply to the remaining group members.

Thank you for your consideration.

Sincerely,

Val Anderson  
President  
Society for Rangeland Management

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<sup>8</sup> National Research Council of the National Academies of Sciences. 2013. "Using Science to Improve the BLM Wild Horse and Burro Program: A Way Forward." Page 6. ("NAS")

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