NATIONAL HORSE & BURRO RANGELAND MANAGEMENT COALITION

Advocating for commonsense, ecologically-sound approaches to managing horses and burros to promote healthy wildlife and rangelands for future generations

DATE: 17 February 2016

TO: Lisa Grant, BLM Burns District Office, 28910 Hwy 20 West, Hines, Oregon 97738

RE: **Support for BLM's Objective to Return and Maintain the Wild Horse Population at Stinkingwater Herd Management Area to Appropriate Management Levels**

FROM: National Horse & Burro Rangeland Management Coalition
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Dear Lisa Grant:

The National Horse & Burro Rangeland Management Coalition[i] appreciates the opportunity to participate in developing a wild horse population management plan for the Stinkingwater Herd Management Area. We strongly support BLM's stated objective to return and maintain the wild horse population at Stinkingwater HMA to Appropriate Management Levels but have some concerns regarding BLM's proposed management action.

The AML for Stinkingwater HMA has a range of 40–80 wild horses.[ii] This number was established based on monitoring data and thorough public review[iii] and is "synonymous with restoring the range to a thriving natural ecological balance,"[iv] as mandated by the Wild Free-Roaming Horses and Burros Act of 1971, as amended.[v] The 2009 Stinkingwater Herd Management Area Plan—as consistent with the BLM Wild Horse and Burro Management Handbook—directs the gather and removal all horses in excess of the lower level AML (40 horses) once the estimated number of horses on the range exceeds the upper level AML (80 horses).[vi] Based on the known reproductive capacity of wild horses in Stinkingwater HMA (18 to 25 percent annual growth), this would result in a gather frequency of every 3 to 4 years.[vii]

The last gather in Stinkingwater HMA occurred in 2010—removing 210 horses and leaving an estimated post-gather population of 40 horses (low AML).[viii] BLM now estimates that the Stinkingwater HMA horse population will reach 235 adult horses by the spring of 2017—nearly three times the upper level AML.[ix] This number also exceeds the known reproductive capacity of wild horses since the 2010 gather, indicating that (1) BLM has in the past underestimated the actual number of horses on the range; (2) BLM has underestimated the herd's population growth potential; and/or (3) additional horses have entered the HMA from either a feral herd on adjacent lands or from the further abandonment of domestic horses.

Taking this into consideration, the Coalition submits the following comments highlighting our concerns with the proposed management action to gather 90 percent of the wild horses in Stinkingwater HMA and treat mares returned to the range with a fertility control vaccine:

- As consistent with the 2009 Stinkingwater HMA Plan, the Coalition encourages BLM to remove excess horses to low AML and conduct subsequent gathers to low AML when the estimated on-range population reaches the high AML of 80 horses. Why have no gathers occurred on the HMA since 2010 despite the population now in excess of the high AML by 155 horses? The proposed and final documents should address this problem.
- What circumstances led to the drastic increase of wild horses on Stinkingwater HMA following the summer 2010 gather that reportedly left 40 horses on the range? If these numbers are correct, that would represent an annual population growth rate in excess of 25 percent—or greater than the upper range described in the 2009 Stinkingwater HMA Plan. How does BLM plan to account for this higher than expected annual growth rate and/or underestimation in total population numbers?
- If BLM only considers the proposed action of gathering 90 percent of the population, this would leave approximately 24 wild horses on the range. To reach the low AML of 40 horses as consistent with the 2009 Stinkingwater HMA Plans, this would mean that only 16 of the gathered horses would be returned to the HMA. Assuming half of the returned horses are mares, only 8 mares would receive a fertility control treatment. Treating less than half of the on-range mares with a temporary fertility control treatment, like PZP, will likely have a limited impact on reducing the reproductive rates of the herd and thus not aid in efficiently maintaining AML. As one possible **management alternative**, the Coalition encourages BLM to consider gathering as close to 100 percent of the population as possible to ensure that at least 90 percent of all breeding-age mares left on the range receive fertility control treatment. Furthermore, this will not eliminate the need for future gathers, but, if properly administered, could potentially suppress population growth enough to extend the time between removals.[x]
- Currently permitted methods of fertility control only slow population growth and require regular follow-up treatments and removals. BLM fertility control efforts have focused on the use of PZP. There are two forms of PZP: A 1-year agent, delivered as a liquid primer injection followed by a booster within four to eight weeks; and a 22-month agent that includes the same primer shot followed by a second injection (by hand) of three time-release pellets.[xi] The 1-year agent requires annual reapplication and the 22-month agent requires reapplication every two years (though since 2004, use of the 22-month agent on 76 HMAs has not shown significant reductions in on-range population increases).[xii] If BLM decides to utilize fertility control, does Stinkingwater HMA have the resources and capacity necessary to conduct full gathers on a near-annual basis to ensure effective re-application of fertility control treatments to at least 90 percent of breeding-age mares?[xiii]
- If BLM decides to continue with their proposed management action to gather 90 percent of the on-range population, the Coalition suggests, as another possible **management alternative**, not releasing any of the gathered horses back onto the HMA. The National Academy of Sciences 2013 review of the wild horse and burro program stated that "a large body of scientific literature on techniques for inventorying horses and other large mammals…suggests that the proportion of animals missed on surveys ranges from 10 to 50 percent."[xiv] If BLM gathers 211 horses from Stinkingwater HMA, the remaining on-range population, taking into account this likely underestimation, would still range from 47–141 horses—numbers above low AML.
- Finally, the Coalition proposes, as another possible **management alternative**, the use of non-reproducing herds through gathering as close to 100 percent of the population as possible and sterilizing all males returned to the HMA as long as the population size remains within AML. This would greatly aid in efficiently controlling population numbers and is consistent with the authority granted in the Wild Free-Roaming Horses and Burros Act of 1971.[xv]

Thank you for considering the input of our coalition. We look forward to working with you.

Sincerely,

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[i] The National Horse & Burro Rangeland Management Coalition includes more than 18 national organizations, encompassing a wide range of sportsmen, livestock grower, state and local government, wildlife, and land conservation organizations and professional societies. Collectively, we represent over 10 million Americans and 6,000 local governments, and focus on commonsense, ecologically-sound approaches to managing horses and burros to promote healthy wildlife and rangelands for future generations.

[ii] Department of the Interior. 1992. Three Rivers Resource Management Plan, Record of Decision, and Rangeland Program Summary. Bureau of Land Management, p. 2-43. Burns District Office, Hines, Oregon.

[iii] Department of the Interior. 2009. Stinkingwater Herd Management Area Plan. Bureau of Land Management, p.3. Burns District Office, Hines, Oregon.

[iv] Animal Protection Institute of America, 109 IBLA 112,118 (1989).

[v] The Wild Free-Roaming Horses and Burros Act of 1971, 16 USC §§1331-1340.

[vi] Department of the Interior. 2009. Stinkingwater Herd Management Area Plan. Bureau of Land Management, pp. 19-20. Burns District Office, Hines, Oregon; Department of the Interior. 2010. Wild Horses and Burros Management Handbook. Bureau of Land Management, p. 20. Wild Horse and Burro Program, Washington, D.C.

[vii] Department of the Interior. 2009. Stinkingwater Herd Management Area Plan. Bureau of Land Management, p.3. Burns District Office, Hines, Oregon.

[viii] Department of the Interior. 2010. Completed Fiscal Year 2010 Gathers. Bureau of Land Management. Wild Horse and Burro Program, Washington, D.C.

[ix] Roy, R. 2017. Preparation for Environmental Assessment (DOI-BLM-ORWA-B050-2017-0002-EA)[Letter to Interested Party]. Bureau of Land Management. Burns District Office, Hines, Oregon.

[x] *See*, Department of the Interior. 2010. Wild Horses and Burros Management Handbook. Bureau of Land Management, pp. 24-25. Wild Horse and Burro Program, Washington, D.C. ("Our current understanding is that to maximize treatment effects, at least 90 percent of all mares should be treated.").

[xi] Department of the Interior. 2010. Wild Horses and Burros Management Handbook. Bureau of Land Management, p. 24. Wild Horse and Burro Program, Washington, D.C.

[xii] Department of the Interior. 2010. Bureau of Land Management Fertility Control White Paper. Wild Horse and Burro Program, Washington, D.C.

[xiii] *See*, Department of the Interior. 2010. Wild Horses and Burros Management Handbook. Bureau of Land Management, pp. 24-25. Wild Horse and Burro Program, Washington, D.C. ("Over the last decade, BLM research efforts in fertility control have been focused on PZP… Because PZP does not totally eliminate reproduction, some excess horses may need to be removed from treated herds over time… There are two forms of the conventional PZP agent: The 1-year agent, delivered as a liquid primer injection and follow-up booster one month later… The 22-month agent that includes the same primer shot as the one-year agent as well as a second injection of three

time-release pellets (1-, 3- and 12-month pellets) … Because 70-90 percent of the breeding-age mares may need to be treated to effectively reduce population growth rates, 80-100 percent of the actual population may need to be captured.").

[xiv] National Research Council of the National Academies. 2013. Using Science to Improve the BLM Wild Horse and Burro Program A Way Forward. The National Academies Press, p. 5.

[xv] Department of the Interior. 2010. Wild Horses and Burros Management Handbook. Bureau of Land Management, pp. 26-27. Wild Horse and Burro Program, Washington, D.C.