



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*

October 2, 2018

U.S. Department of the Interior
Bureau of Land Management
National Wild Horse and Burro Program
Attention: Dorothea Boothe
WO-260, 20 M Street SE, Room 2134LM
Washington, DC 20003

Dear Members of the National Wild Horse & Burro Advisory Board:

Thank you for the opportunity to provide both written and verbal testimony on the current state of our nation's rangelands.

The National Horse and Burro Rangeland Management Coalition (NHBRMC) is comprised of 18 national organizations representing over 10 million Americans including sportsmen, livestock growers, state and local governments, resource management specialists, professional land managers, and others concerned with the management of horses and burros in a commonsense and ecologically-sound way.

Our members are the individuals most closely tied to the Western landscape. They depend upon our nation's vast natural resources for both economic and quality of life purposes, and are becoming increasingly more concerned with the ability of this landscape to support a burgeoning wild horse and burro population for future generations. The current horse and burro population is more than three times what the land can support, and will only continue to increase.

At the previous two National Wild Horse & Burro Advisory Board meetings, board members recommended that the Bureau of Land Management (BLM) and the U.S. Forest Service take difficult, but necessary steps to reduce the number of animals held in off-range holding facilities and to therefore be able to better manage the on-range situation. These recommendations included phasing out long-term holding over the next three years and applying that budget to on-range management and adoptions; creating funding mechanisms to maximize adoptions and sales; and encouraging BLM to immediately follow the Wild Free-Roaming Horses and Burros Act and remove excess animals from the range to achieve Appropriate Management Level (AML).

In September 2016, the Advisory Board made the following recommendation:

American Farm Bureau Federation • American Sheep Industry Association • Congressional Sportsmen's Foundation
Masters of Foxhounds Association • Mule Deer Foundation • National Association of Conservation Districts
National Association of Counties • National Association of State Departments of Agriculture
National Cattlemen's Beef Association • National Rifle Association • National Wildlife Refuge Association
Public Lands Council • Public Lands Foundation • Rocky Mountain Elk Foundation • Safari Club International
Society for Range Management • The Wildlife Society • Wild Sheep Foundation



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“BLM should follow the stipulations of WHB Act by offering all suitable animals in long and short term holding deemed unadoptable for sale without limitation or humane euthanasia. Those animals deemed unsuitable for sale should then be destroyed in the most humane manner possible.”

We understand that the recent recommendations were not easy ones to make, but are critical and were undertaken only after careful review of the dire situation facing the wild horse and burro herds, native wildlife, and our public rangelands. Because it reflects original Congressional intent and will help resolve the current wild horse and burro overpopulation crisis, our Coalition supports the Advisory Board’s recommendations which advance active management to ensure AML is maintained on the range.

Unfortunately, since those recommendation in 2016, the on-range population of horses and burros grew from 67,027 to 81,951 (as of March 1, 2018). The lack of actionable steps taken to reduce on-range populations only exacerbates the current crisis. The Board should continue making bold recommendations to encourage the Administration to act.

Overpopulation of horses and burros, continues to threaten the health of our rangelands and negatively impacts the multiple-use of these public lands. To ensure healthy rangelands for future generations, the National Wild Horse and Burro Advisory Board should:

- 1) re-emphasize its previous recommendations that encourage the Secretaries of the Interior and Agriculture to implement the management tools needed to achieve ecologically-sustainable wild horse and burro populations within a reasonable amount of time, and
- 2) encourage the BLM and USFS to increase the number of animals removed from the range in order to restore and protect rangeland habitats, and
- 3) strategically apply sterilization and fertility control drugs on herds once populations are at management goals, where such methods are deemed effective and cost-efficient by scientific evaluation.

Thank you for considering the input of our coalition. We have provided additional information in Attachment A below.

Sincerely,

Ethan Lane
Chair, NHRMC
Executive Director, Public Lands Council

Lia Biondo
Vice Chair, NHRMC
DC Liaison, Society for Range Management

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Attachment A - Executive Summary

Management Objective: Sustain healthy rangelands that support a balance of multiple uses, including wild horses, wildlife, ecosystem services, and livestock

Identified Problems in Reaching that Objective for the Advisory Board to Consider

1. Wild horse and burro populations already exceed ecologically-based management objectives.
2. Populations of wild horses and burros continue to grow at exponential rates.
3. Bureau of Land Management and U.S. Forest Service have limited options available to manage wild horses and burros to protect the range and achieve mandate of law.

Section 1: Historical and Legal Context

- Horses and burros are non-native species in North America; those present and free-roaming on western rangelands are the descendants of domestic stock.
- The Wild Free-Roaming Horses and Burros Act of 1971 charges BLM and USFS with managing horses and burros found on certain public lands in a “manner that is designed to achieve and maintain a thriving natural ecological balance”.
- Federal law requires multiple use of rangelands, including that of wild horses and burros.

Section 2: Wild horse and burro population status and trends

- ~82,000 horses and burros reside on BLM managed rangelands with an AML of ~27,000
- ~ 48,000 horses and burros are in long- and short-term holding facilities
- 15–20% annual population increase; potential to double in size every 4–5 years

Section 3: Impacts of excess wild horses and burros

1. Horse and burro health – starvation and dehydration are a likely result of overpopulation
2. Native wildlife – competition for water and food resources and habitat degradation
3. Rangeland ecosystem – soil compaction, spread of invasive species, desertification
4. Western heritage – reduced grazing, impact to recreational activities; local economies at risk
5. Taxpayer dollars – \$50 million spent on horses and burros in holding; costs continue to rise

Section 4: Available Management Actions Identified by the Coalition for Consideration

- Achieving population objectives that balance wild horse and burro populations with the needs of rangeland health will require the application of multiple management activities.
- The Advisory Board needs to consider all management options available under the WFRNBA.

On-range: reduce populations & slow growth

- Increase gathers and removals
- Increase use of fertility control
- Apply sterilization techniques
- Create non-reproducing herds

Off-range: relieve BLM of budget obligations

- Increase adoptions via incentives
- Consider euthanasia
- Consider unrestricted sale
- Increase budget for holding

Section 5: Conclusions and Recommendations for the Advisory Board

- Recommend actions that enable BLM and USFS to gather and remove more horses and burros to achieve ecologically-sustainable population levels, support multiple uses of the range, and ensure rangeland health.

Section 1: Historical and Legal Context

A. Origin of wild, free-roaming, and feral horses and burros in North America

Many horse lineages evolved in North America but disappeared from the landscape nearly 12,000 years ago during the Pleistocene epoch—a geological period characterized by repeated cycles of glaciation; global cooling; and the presence of several distinctive large land mammals. During the late Pleistocene, several of North America’s large mammals went extinct, including but not limited to mastodons, saber-toothed cats, and all forms of the American wild horse. Since the extinction of North American horses, the southwestern United States has transitioned over thousands of years from a cool climate with abundant precipitation to the more arid and warm environment of today.

All free-roaming horses and burros currently present in North America are feral descendants of domesticated animals from Eurasia and Africa respectively. As feral animals, these horses and burros have undergone many generations of selective breeding (or artificial selection). However, many people still perceive feral horses and burros as “natural” components of the environment, not understanding the damages they inflict on today’s native systems.

B. Motivation and components of the Wild Free-Roaming Horses and Burros Act of 1971

In the 1950’s several individuals and humane organizations grew concerned over the treatment of feral horses and burros in the American West, and fearing their eradication, urged Congress to provide federal protections. By 1971, Congress passed the Wild Free-Roaming Horses and Burros Act (WFRHBA), which declares “wild free-roaming horses and burros [as] living symbols of the historic and pioneer spirit of the West;” to be managed as “components of the public lands;” in a “manner that is designed to achieve and maintain a thriving natural ecological balance.”

C. Other laws and policies impacting horse and burro management

In 1978, the Public Rangelands Improvement Act amended WFRHBA by directing BLM and USFS to determine appropriate management levels (AML) of horses and burros in herd management areas (HMA) consistent with the principles of “multiple use and sustained yield” as established by the Federal Land Policy and Management Act of 1976. BLM and USFS establish AML through an interdisciplinary and site-specific environmental analysis and decision process that includes public involvement. Each AML expresses a population range within which wild horses and burros can be sustainably managed in balance with other uses. Wild horse and burro populations currently exceed AML by over 250%, primarily because of the presence of conflicting directives from Congress and the failure of BLM and USFS to comply with WFRHBA.

In order to “maintain a thriving natural ecological balance,” WFRHBA, as amended, allows for agencies to destroy or sell without limitation, excess wild horses and burros for which an adoption demand does not exist. However, BLM and USFS have failed to comply with these provisions over fears of the anticipated negative public reaction from both the general public and Congress. Furthermore, when these options have been considered, Congress has taken steps to ensure that no horses or burros are euthanized or sold without limitation as allowed under WFRHBA by adding to the Interior Appropriations Act a rider that restricts the use of these management tools.



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Section 2: Wild Horse & Burro Population Status, Management Actions, and Trends

The BLM provides estimates of on- and off-range wild horse and burro populations, management activities, and budget. These are the best estimates available for understanding the status and trends of wild horse and burro populations and management activities. Note: horses and burros exist on federal lands beyond BLM - including USFS, NPS, USFWS, and DOD – and on state, tribal, and private lands, but this testimony focuses on BLM’s wild horses and burros covered by federal law.

A. On-range population numbers and management actions

BLM estimates **81,951 wild horses and burros** roam across 10 western states as of March 2018. This is an **increase of 14,924 animals** over March 2016 population estimates. This population estimate exceeds the ecologically-based appropriate management level (AML) of **26,690 animals**.

More than 55,261 excess animals are currently on BLM rangelands (173% over capacity). On-range populations are doubling every 4 to 5 years under the current management regime.

BLM **gathered and removed 4,209 animals during FY2017 (889 more than FY2016)**. Note: these removals are in addition to the on-range population growth; the on-range population would actually grow by >9,000 per year without any removals. The BLM has generally gathered and removed fewer horses and burros in recent years. This level of removals will not keep pace with on-range population growth.

Fertility control applications have also been limited and ineffective. The BLM **applied fertility control to 777 individuals** in FY2017. Sterilization is being discussed, but has not yet been implemented.

B. Off-range population numbers and management actions

As of March 2017, BLM had more than **48,000 animals in holding facilities**. Each animal placed in holding facilities costs BLM approximately \$50,000 over its lifetime.

The BLM **adopted 3,517 animals** in FY2017 and **sold an additional 582 animals**. Adoptions and restricted sales have not kept pace with the growth of the on-range population, and cannot be expected to do so in the future – resulting in the need for increased holding capacity.

C. Outlook

BLM’s management actions are not effective in reducing populations or stopping population growth. Under the current management approach of removing ~3,500 animals per year with 18% growth, and barring massive die-offs, the following population numbers are likely:

- Year 2020 = 107,000 animals on-range
- Year 2024 = 189,000 animals on-range
- Year 2028 = 348,000 animals on-range



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Section 3: Impacts of Excess Wild Horse & Burro Populations

When wild horse and burro populations exceed ecologically-sustainable levels, they can have negative impacts on many of the multiple-uses of public rangelands.

A. Horse & Burro Well-being

Horse and burro populations can negatively affect their own health and well-being when they exceed ecologically-sustainable levels. Excessive populations deplete scarce food and water resources on the arid rangelands, leading to starvation and dehydration of the horses and burros.

BLM gathered and removed over 9,000 horses and burros during 24 emergency gathers from 2006-2015 due to dire animal health situations resulting from poor rangeland conditions. If we wish to maintain healthy herds on our public rangelands, we need to ensure those herds are sustainably managed at appropriate levels.

B. Native Wildlife and Threatened and Endangered Species

Elk, mule deer, pronghorn, sage-grouse, bighorn sheep, lizards, and a suite of other native wildlife rely on our public rangelands to survive. The well-being of wildlife, including threatened and endangered species, are put at risk by growing populations of horses and burros.

Horses and burros compete with native wildlife for food and water. As horse and burro populations continue to grow, they consume more and more of these scarce resources, leaving less for our native wildlife.

Horses and burros often express dominant behavior towards native wildlife, particularly around water sources. Horses have been documented pushing native ungulates off of water sources and restricting access to the resource, and some native wildlife have shown avoidance of an area when horses are present.

Sage-grouse habitats overlap with 30% of BLM horse and burro management areas. Horses and burros overgrazing forage, trampling vegetation, spreading invasive species, and causing soil compaction, all weaken efforts to keep this bird off of the Endangered Species list.

C. Rangeland Ecosystem

Areas inhabited by horses and burros tend to have fewer plant species, less vegetative cover, and an increased susceptibility to invasive plant species – which can have ecosystem-wide implications.

Overpopulation leads to overgrazing of the rangelands, where the consumption of vegetation reduces plant species and vegetation cover. The removal of vegetation also makes rangelands vulnerable to invasive species, with cheatgrass in particular spreading throughout the West.

Soil compacted by excessive horse and burro hoof traffic limits water infiltration, increases runoff and erosion, inhibits root and plant growth, and restricts nutrient cycling by soil microbes.

Consistent overgrazing and soil compaction exposes the soil to the elements, causing it to dry out. This process is known as desertification and it causes already dry land to become increasingly arid. Bodies of water on the range dry up, and native species dependent on the former rangeland can no longer survive in the desert landscape.



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D. Western Heritage

Western rangelands are utilized by ranchers, farmers, hunters, campers, and other recreationists. The detrimental ecological impacts of horse and burro overpopulation have resulted in a depletion of resources for cattle as well as for native wildlife that draw outdoor enthusiasts to the area.

Over 90% of public lands are located in Western states. Many communities are dependent on access to and use of these lands for their livelihoods. Because they depend on this resource, these communities are invested in maintaining and improving the health of the rangelands. By paying grazing fees, utilizing targeted grazing to control invasive species and reduce fire fuel loads, and other actions, they help support healthy watersheds, carbon sequestration, recreational opportunities, and wildlife habitats.

Over \$887 billion annually is contributed in direct spending by outdoor recreationists, including hikers, hunters, and bird-watchers for equipment and travel. This spending generates approximately \$59.2 billion in state and local tax revenue.

E. Taxpayer Dollars

American taxpayers pay for the costs of the BLM's Wild Horse and Burro Program. This program's budget continues to be consumed by the off-range holding facilities, causing BLM to remove fewer and fewer horses and burros from the rangelands. The horses and burros removed from rangelands and placed in holding facilities currently cost taxpayers about \$50 million annually. For an animal that remains in one of these facilities for its entire life, the cost can reach \$50,000 per animal.

BLM spent nearly \$82 million on the horse and burro program in Fiscal Year 2017. This money was used to remove a small number of horses from the rangelands (\$4.2 million), adopt out approximately 3,500 horses (\$7.9 million), and care for horses and burros in long- and short-term holding facilities (\$48.6 million). Costs continue to increase every year, and horse and burro populations continue to grow. For the 5 years of FY2012-FY2016, more than \$370 million was spent on the wild horse and burro program – and the result was an additional 56,000 horses and burros added to the population.

Continuing to leave excess horses and burros on rangelands only exacerbates the costs. The larger the rangeland populations become, the greater the damage they cause to the ecosystem. As rangelands deteriorate, the costs associated with restoring habitat for wildlife and other rangeland uses increases. This can lead to increased costs and time spent implementing state wildlife plans as well as federal measures such as Endangered Species Act listings.

Section 4: Available Management Actions Identified by the Coalition for Consideration

There are two spheres of management consideration for wild horses and burros: A) management of on-range populations, and B) management of off-range populations. Each sphere has its own objectives and challenges that need to be addressed. Neither is currently in a sustainable status.

BLM's current management model for wild horses and burros can be summarized as 1) set horse and burro population management objectives (AML) based on multiple use rangelands and ecological thresholds, 2) identify excess horses and burros that exceed those population objectives, 3) remove excess horses and burros, 4) adopt out horses and burros.

Unfortunately, this model has proven to be an ineffective management approach. On-range wild horse and burro populations continue to grow at exponential rates of 15–20% annually, essentially unaffected by the limited management actions being implemented by BLM. Off-range populations remain at high levels as adoption demand steadily declines and cannot keep pace with the increasing number of excess horses and burros. Costs of the program have reached untenable levels.

Improved management actions are needed throughout all aspects of this program. The one action we should not consider is maintaining the status quo of leaving excess horses and burros on the rangelands. Doing so places our rangelands – and all animals and multiple-use activities that rely on those rangelands – at risk.

All management actions listed below are permitted and/or directed by the Wild Free-Roaming Horses and Burros Act of 1971, as amended. Effective management – i.e. management that achieves and sustains wild horse and burro population objectives at ecologically-sustainable levels – will likely require a combination of these methods.

A. On-Range Population Management

The population management goal for on-range wild horses and burros has been set based on evaluations of rangeland health and the other uses of public rangelands – this is referred to as the Appropriate Management Level (AML). We need to remain focused on achieving and maintaining that goal in our on-range management activities in order to produce healthy rangelands that sustain healthy wild horse and burro herds. On-range management activities should be able to 1) reduce the current population, and 2) maintain the population at ecologically-sustainable levels.

Methods for improving management of on-range wild horse and burro populations could include:

1) Increase Gathers & Removals – BLM employees and contractors gather horses and burros from the rangelands via a variety of methods (e.g. helicopter roundups, water bait traps, etc.) that follow established humane protocols and procedures. This is the primary method of reducing populations of on-range horses and burros.

Benefits: Gather and removal of excess horses and burros is the most effective form of reducing the current population on the range. In a May 2016 letter to members of Congress, BLM indicated that the only method of achieving AML within 3, 5, or 10 years is by removing large numbers of animals from the range.



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Challenges: Gatherings can be costly and difficult to administer in certain areas due to the rugged terrain and size of some herd management areas.

Legal considerations: Currently permitted by law; some court orders direct or restrict the removal of horses and burros from certain areas.

2) Increase use of Fertility Control Vaccines/Contraception – the most discussed fertility control vaccine is known as PZP, porcine zona pellucida, which is an immunocontraception that prevents sperm attachment to the egg. This produces temporary infertility in the mare. This drug is administered by either hand-injection or remotely via darting. Further research and development of scientifically-sound methods of fertility control is still needed.

Benefits: When applied in a robust manner, fertility control drugs can effectively reduce population growth rates in some controlled situations. Lower reproductive rates can mean reduced need to gather and remove horses and burros in the future and reduce the strained capacity in BLM holding facilities.

Challenges: The National Academy of Sciences determined in their 2013 report that no highly effective, easily delivered, and inexpensive fertility-control methods are currently available.

PZP is only effective at reducing pregnancies for one year, with some limited evidence of longer-term effectiveness. Methods of delivery (e.g. hand-injection or darting) require the gather of animals and/or the ability to get in relatively close proximity to administer the drug – both of which are logistically and fiscally challenging in most western rangelands.

Fertility control does not reduce the current on-range population; it only slows the growth (but does not stop the growth) of the population.

Legal considerations: Currently permitted by law

3) Apply Permanent Sterilization – sterilization would render an individual reproductively inviable for the remainder of its life. This can be accomplished via surgical methods, primarily focused on the mare.

Benefits: Permanent sterilization would help reduce the growth rate of on-range populations. This method improves on fertility control vaccines because of the reduced need to gather horses and burros to apply the drug. Animals would be gathered and handled once and would not need to be gathered again.

Challenges: No sterilization method is currently being implemented for wild horses and burros. BLM is initiating research on a variety of sterilization methods to determine their efficacy and humaneness in applying these methods to wild horses and burros on the range.

Sterilization does not reduce the current on-range population; it only slows the growth (but does not stop the growth) of the population. Cost of performing the procedure on a large population may also be a factor.

Legal considerations: Currently permitted by law

4) Create non-reproducing herds – BLM could establish herds of all sterilized male or all sterilized females. These herds would be non-reproducing herds and would therefore remain stable in size.



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Benefits: Non-reproducing herds would not require regular gathering or fertility control application to prevent growth.

Challenges: BLM would need to manage the logistics; if external animals were introduced to the non-reproducing herd, breeding could be initiated.

Legal considerations: Currently permitted by law; some court challenges are pending

B. Off-Range Population Management

Off-Range management needs to relieve BLM of either 1) the obligation and responsibility of caring for animals indefinitely, or 2) the budget constraints such obligations produce. By relieving BLM of the off-range pressure, more focus and resources can be provided to on-range management options, controlling populations, and protecting the rangelands.

Methods for improving management of off-range wild horse and burro populations could include:

1) Increase adoptions/transfers via incentives and authorities – This method involves the transfer of animals to private individuals and/or government agencies. The intent is those receiving the animals are committed to providing a healthy environment for the animal. Transferred animals typically retain their protected status under the law. Incentives could be produced to encourage adoptions.

Benefits: Animals placed in adoptive facilities would no longer be under the direct care of BLM. Each animal transferred would reduce the obligation of the federal government to care for the animals.

Challenges: Even if adoption were to reach historic levels, the on-range growth rate would still outpace public demand.

Legal considerations: Adoptions are currently permitted by law; authority to transfer horses to other agencies was included in the Consolidated Appropriations Act, 2017.

2) Authorize euthanasia – excess animals that meet certain criteria (e.g. beyond a certain age; deemed unadoptable) would be euthanized using humane methods. Euthanized horses and burros could be disposed of on-site.

Benefits: Euthanizing animals would relieve BLM of the burdens of caring for these animals in holding facilities throughout the remainder of their lives, freeing up holding space and funds for managing on-range populations.

Challenges: Euthanasia can be a controversial approach to management among the public.

Legal considerations: Authorized under the Wild Free-Roaming Horses and Burros Act of 1971, but restricted via Congressional appropriations language and BLM internal policy. BLM does currently euthanize gathered animals that are in extremely poor body condition.

3) Permit unrestricted sale - excess animals that meet certain criteria (e.g. beyond a certain age; deemed unadoptable) would be sold. Sale would not be restricted to any particular buyer and would not require any contractual agreements.



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Benefits: Unrestricted sale would relieve the BLM of the burden of caring for these animals in holding facilities for the remainder of their lives, freeing up holding space and funds for managing on-range populations. Revenue generated from the sale could be used to support other program activities.

Challenges: Unrestricted sale is viewed as synonymous with the slaughter of horses.

Legal considerations: Authorized under the Wild Free-Roaming Horses and Burros Act of 1971, as amended, but restricted via Congressional appropriations language and BLM internal policy. BLM does currently sell a few hundred horses each year, but have policies in place to limit the number of animals sold to an individual.

4) Increase budget for holding facilities, but not at the expense of on-range management – holding facilities currently use about 65% of BLM’s wild horse and burro program budget. Increases in budget for holding facilities would need to ensure that on-range management could continue.

Benefits: Allows BLM to remove more horses and burros from the range, while simultaneously maintaining care for those excess animals in holding facilities.

Challenges: Budgets for federal agencies are tight and finding additional funds on the magnitude (i.e. several billion dollars over the next few decades) that are needed to care for all of the excess horses and burros will be difficult. BLM will continue to be responsible for caring for thousands of horses and burros over their lifetime.

Legal considerations: Would need to be addressed via annual federal appropriations process

Section 5: Conclusions and Recommendations for the Advisory Board

The National Wild Horse & Burro Advisory Board has the duty of offering advice and recommendations to the Secretary of the Interior and the Secretary of Agriculture that assist them in carrying out their responsibilities under the Wild Free-Roaming Horses and Burros Act of 1971.

Pursuant to that objective, we recommend the Advisory Board **submit a letter to the Secretaries that highlights the following facts and encourages action by the Secretaries to support the goal of healthy horses on healthy rangelands.**

1. Re-emphasizes the Advisory Board's recommendations

Since the Advisory Board's recommendations, the situation has only continued to deteriorate. The board's decision represents the most practical, pragmatic, and efficient course of action to achieve the goal of healthy horses on healthy rangelands.

2. Prioritization of healthy rangelands

Health of the public's rangelands should be prioritized above all other considerations. Healthy rangelands are where native wildlife can thrive, livestock can graze to support local communities, free-ranging horses and burros can live healthy lives, and water quality can be sustained.

Healthy rangelands can rebound from moderate disturbance naturally and in a timely manner; habitat quality is sustained; and natural growth processes are enabled. Healthy rangelands are critical to the future of the Western way of life.

It is increasingly important that an emphasis be placed on habitat quality and protection of native wildlife, particularly where HMAs overlap with priority areas of conservation of the Greater Sage-Grouse.

3. Wild horse and burro populations threaten healthy rangelands; populations continue to grow unchecked

Wild horse and burro populations already exceed ecologically-based population objectives, and their populations continue to grow at 15-20% per year. Overpopulation of horses and burros threatens the health of public rangelands and negatively impacts several other uses of public rangelands. Under current conditions, the BLM gathers are no longer able to keep up with on-range population growth, further adding pressure to the already severely strained rangelands.

4. BLM and USFS need to increase gathers and removals to ensure healthy rangelands for the future

The current management paradigm of the federal agencies does not work – it is not achieving the goal, and cannot achieve the goal. ***Increasing gathers and removals is the only strategy that will achieve ecologically-sustainable population objectives within a reasonable amount of time.*** It is critical that large scale gathers are done that also include the gathering in areas immediately bordering HMAs. Scientifically-proven fertility control and other population growth suppressants should be utilized more robustly once appropriate management levels have been achieved. Current uses of fertility control need to



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be done in a more strategic way in order to increase effectiveness. Population growth suppressants cannot achieve appropriate management levels on their own.

5. Encourage Congress to address policy barriers, conflicts, and challenges to enable improved management

Though the current Administration is on track to remove 10,000 horses this year, more horses and burros need to be gathered to achieve ecologically-sustainable population levels, support multiple uses of the range, and ensure rangeland health. Agencies cannot gather more animals until either 1) budget increases enable them to care for more animals in holding facilities, or 2) they can be relieved of animals currently in holding facilities.