23 September 2020

National Wild Horse & Burro Advisory Board
C/O Bureau of Land Management
1849 C Street NW
Washington, D.C. 20240
whbadvisoryboard@blm.gov

Dear National Wild Horse & Burro Advisory Board Members:

The Wildlife Society appreciates the opportunity to provide written comments which emphasize the damage that free-roaming horse and burro populations are having on public land ecosystems and the necessity of reducing herd numbers as soon as possible to conserve natural resources and support wildlife populations.

Founded in 1937, The Wildlife Society (TWS; wildlife.org) and our network of affiliated chapters and sections represents over 15,000 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 their habitat through science-based management and conservation.

The Wildlife Society supports the Bureau of Land Management's National Wild Horse and Burro Program and the U.S. Forest Service in their efforts to ensure that healthy herds thrive on healthy rangelands. However, as on-range populations continue to dramatically exceed ecologically sustainable levels and the health of public lands continues to degrade, The Wildlife Society is increasingly concerned about the Administration's lack of progress on effectively reducing populations. The continued overpopulation of federally managed horses and burros on public lands threatens the ecological integrity of the rangelands while unduly impacting the ability of wildlife professionals to effectively manage and promote healthy rangelands and native species for future generations.

As a result, The Wildlife Society urges the Advisory Board to emphatically impress upon the Secretaries of the Interior and Agriculture the ongoing and future consequences of ecological overpopulation of feral horses and burros. We ask that the Advisory Board recommend the U.S. Forest Service and BLM direct increased attention and resources towards removing enough horses and burros from the public lands each year to effectively reduce populations, restoring degraded areas, and ensuring the conservation of these ecologically diverse landscapes.

Bureau of Land Management Status

The BLM has established an on-range Appropriate Management Level (AML) of 26,690 federally designated "wild" horses and burros.[1] As of March 2020, BLM estimates that on-range wild horse and burro populations are at approximately 95,114 individuals - more than three and a half times the

[1] BLM, *Wild Horse and Burro Program Data*. Retrieved August 29, 2020 from https://www.blm.gov/programs/wild-horse-and-burro/about-the-program/program-data.

AML and an increase of more than 7,000 since the previous March[2], despite the removal of over 7,000 animals from the range during that same time period.

With an estimated annual population growth rate of up to 20%[3] wild horse and burro populations will soon surpass 100,000, unless large-scale removal efforts are undertaken. Without adequate management options, wild horse and burro populations will continue to grow at rates that will double on-range population numbers every four to five years.

U.S. Forest Service Status

The U.S. Forest Service (USFS) also manages federally designated "wild" horse and burro populations across 34 Herd Territories.[4] As of February 2014, USFS estimated that 6,483 horses and burros inhabited Forest Service Herd Territories, which had an AML of 2,253 animals.[5] Based on annual population growth estimates and minimal use of population control measures, current populations could now be 15,000, almost than seven times the AML.

Recommendations

The overpopulation of horses and burros on public lands directly contributes to degradation of rangeland ecosystems and hampers the ability of wildlife professionals to sustainably manage and conserve native wildlife populations[6]. For these reasons, The Wildlife Society encourages the Advisory Board to urge the Secretaries to prioritize and implement science-based management solutions that will quickly and effectively reduce the number of on-range horses and burros to ecologically-sustainable levels.

The Wildlife Society requests the Advisory Board continue to highlight the need for the BLM to have the full suite of management tools available to the agency as directed by the 1971 Wild Free-Roaming Horses and Burros Act, as amended. Limiting effective management options is causing undue stress on the WHB Program and preventing the program from achieving its goals of sustainably managing wild horses and burros on healthy rangelands.

We continue to recommend that the options provided by the BLM in their 2020 report to Congress[7], be evaluated by the Board for their scientific rigor, effectiveness, and feasibility in application. This report indicates a goal of achieving AML in 15-18 years – which is considerably longer than the timeline provided in the agency's 2018 report to Congress. This plan also indicates a cost of approximately $900 million during just the first 5 years of implementation. Such costs warrant rigorous evaluate of the plan and strict adherence to implementation of effective measures.

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[2] *Ibid*.
[3] BLM, About the Wild Horse and Burro Program. Retrieved August 29, 2020 from https://www.blm.gov/programs/wild-horse-and-burro/about-the-program.
[4] USFS, *About the Wild Horse and Burro Program.* Retrieved August 29 2020, from https://www.fs.fed.us/wild-horse-burro/aboutus.shtml.
[5] USFS, *US Forest Service Wild Horse and Burro Territories.* Retrieved August 29, 2020 from https://www.fs.fed.us/wild-horse-burro/documents/territories/USFSWildHorseBurroTerritories2014.pdf.
[6] Beschta, R.L., Donahue, D.L., DellaSala, D.A., Rhodes, J.J., Karr, J.R., O'Brien, M.H., Fleischner, T.L. & Williams, C.D., *Adapting to Climate Change on Western Public Lands: Addressing the Ecological Effects of Domestic, Wild, and Feral Ungulates,* ENVIRONMENTAL MANAGEMENT (2013) 51: 481, *available at* http://www.uwyo.edu/law/directory/_files/donahue.pdf.
[7] BLM, *An Analysis of Achieving a Sustainable Wild Horse and Burro Program* Report to Congress (2020) *available at https://www.blm.gov/sites/blm.gov/files/WHB-Report-2020-NewCover-051920-508.pdf*

The report highlights that a large increase in gathers is the primary population control mechanism being explored by the BLM.[8] The Wildlife Society strongly encourages the Advisory Board to recommend that the BLM work to reduce the number of horses and burros on public lands by increasing the number of animals gathered and removed to achieve AML as quickly as possible.

The application of fertility control measures – particularly permanent, surgical procedures – is also a central element of the BLM's plan.[9] The Wildlife Society recognizes the role of these population growth suppression tools in already well-managed populations, and supports the BLM's study of permanent mare sterilization techniques. We believe sterilization is preferred over porcine zona pellucida (PZP), which has proven unsuccessful as a long-term solution due to its short-lived effectiveness. Like the BLM, The Wildlife Society is encouraged by recent research into GonaCon, which has an efficacy rate of up to 90 percent for the 4-5 years after an initial treatment and booster.[10] However, we caution that fertility control measures – whether temporary or permanent – only slows the population *growth*, but does not actively reduce population numbers. On-range numbers must be reduced as quickly as possible to allow rangeland ecosystems to recover.

The Wildlife Society recognizes that the BLM is currently over-burdened, both financially and logistically, by the large number of excess horses and burros in off-range holding facilities. The Wildlife Society has urged Congress to remove the restrictions currently placed on management options – including euthanasia and unrestricted sale – that are directed by the Wild Free-Roaming Horses and Burros Act of 1971, as amended. Implementing the WFRHBA with its full directive would allow for better management of herds, reduce the growing burden on the BLM, allow taxpayer dollars to go to more fruitful and effective conservation efforts, and enable the agency to achieve the "thriving natural ecological balance" required by the law.[11]

The Wildlife Society supports the desire for the well-being and humane treatment of horses and burros in all management actions. We appreciate the willingness of the BLM to address on-range horse and burro populations, as taking no action would almost certainly result in detrimental effects to everything that relies upon the rangelands for survival, including horses and burros and native wildlife. Overpopulation of horses and burros will eventually result in a situation of self-limitation, where resources can no longer support these feral populations[12] - or any of the native wildlife that rely on these same resources.

Failing to act would also ignore the provision of the Wild Free-Roaming Horses and Burros Act of 1971 that requires maintaining a "thriving natural ecological balance" among horse and burro populations, wildlife, vegetation, and other mandated uses of the range.[13] The Wildlife Society strongly encourages using humane lethal control on excess horses and burros as a way to ensure thriving, healthy herds and to minimize suffering of unwanted and unadoptable animals.

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[8] *Ibid*.
[9] *Ibid*.
[10] *Ibid*.
[11] National Horse & Burro Rangeland Management Coalition, *Testimony for oversight hearing entitled "Challenges and Potential Solutions for BLM's Wild Horse & Burro Program,"* (June 22, 2016), *available at* http://democrats-naturalresources.house.gov/imo/media/doc/testimony_norris1.pdf.
[12] National Academy of Sciences, *Using Science to Improve the BLM Wild Horse and Burro Program* 66 (2013), *available at* http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprd3796106.pdf.
[13] Wild Free-Roaming Horses and Burros Act of 1971, Pub. L. No. 92-195, § 3(a), *available at* http://www.wildhorseandburro.blm.gov/92-195.htm.

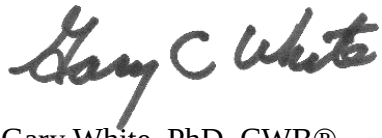
Conclusion

Without a significant increase in the rate of removal of horses and burros, these populations will continue to expand and our nation will witness growing degradation of its ecologically important and unique rangeland ecosystems.

The Wildlife Society urges the Advisory Board to recognize the dire nature of ecological overpopulation of feral horses and burros by recommending the U.S. Forest Service and BLM direct adequate attention and resources towards removing enough horses and burros from rangelands each year to conserve the ecologically diverse rangelands and measurably improve currently degraded areas. Further, The Wildlife Society encourages prudent consideration of reducing the number of horses held in facilities from previous roundups.

Thank you for your service on this important Advisory Board and for considering the views of wildlife professionals. We invite your questions regarding this important issue. Please contact Caroline Murphy, government relations manager, at cmurphy@wildlife.org or (301) 897-9770 x 308 with any questions.

Sincerely,



Gary White, PhD, CWB®
President

Enclosure – TWS Issue Statement: Feral Horses and Burros in North America

Issue Statement

Feral Horses and Burros in North America

Feral horses and burros are invasive species in North America. Exotic, non-native species are among the most widespread and serious threats to the integrity of native wildlife populations because they invade and degrade native ecosystems. When invasive species are perceived as a natural component of the environment, the general public may regard them as "natural," not understanding the damages they inflict on native systems. These misperceptions create special challenges for wildlife managers. As a result, some groups advocate conservation and management of exotic species that promote their continued presence in landscapes where they are not native. Because these species are exotic, few policies and laws deal directly with their control. Feral horses (*Equus caballus)* and burros *(E. asinus)* that roam freely across western North America and along the Atlantic coast are examples of such species: they are iconic and beloved by some, but damage wildlife habitat and require improved and sustainable management practices. The numbers and impact of feral horses and burros can be difficult to control, amplifying their effects on native habitat and wildlife. In some cases, management of feral horses and burros and their effects divert resources (human and financial) from management of native species and habitat.

Feral horses and burros in North America are descendants of domestic horses and burros that either escaped from or were intentionally released by early European explorers and later settlers. Although many horse lineages evolved in North America, they went extinct in North America approximately 11,400 years ago during the Pleistocene, along with many other mammals. All horses and burros now present in North America are descendants of those domesticated in Eurasia and Africa (respectively) and were subjected to many generations of selective breeding (artificial selection) before they were introduced to North America by settlers. Since native North American horses went extinct, the western United States has become more arid and many of the horses' natural predators, such as the American lion and saber-toothed cat, have also gone extinct, notably changing the ecosystem and ecological roles horses and burros play.

Herds of feral horses and burros can damage the habitat they occupy. Estimates suggest that these herds range across more than 45 million acres in 10 American states and 2 Canadian provinces in western North America. Feral horses are also found in eastern North America on barrier islands off the coasts of Maryland, Virginia, Georgia, North Carolina, and Nova Scotia. Large herbivores (both native and non-native) disturb landscapes by trampling soils and vegetation, selectively grazing palatable plants, and altering the distribution of nutrients in the ecosystem. Research in the Great Basin has reported that areas inhabited by feral horses have fewer plant species and less grass, shrub, and overall plant cover than areas without horses, and more invasive plant species and weeds such as cheatgrass, an invasive species that degrades wildlife habitat. Riparian and wetland areas may also be impacted by feral horses and burros through soil compaction and increased erosion. The overall impact feral horses and burros have on any type of ecosystem depends on intensity and duration of use, timing, and the health and

resilience of the area. Where feral horse and burro density is high, lands are degraded, water resources are limited, and native species are already stressed, impacts can be substantial.

When feral horses and burros are introduced to an ecosystem, much of the native habitat is used by these non-native grazers. Free-ranging horses typically use higher elevations and steeper slopes than cattle, often moving to higher elevations for grazing, defense, and temperature control. Because of horses' flexible lips and long incisors, they are able to crop vegetation close to the soil surface, which can delay re-growth of grazed plants. The digestive systems of burros and horses dictate that they must ingest more forage per unit of body mass than any other large-bodied grazer in western North America. Feral horses are also dominant among native Great Basin ungulates in social interactions, notably at watering areas. There may not be aggressive behavior among horses, deer, and bighorn sheep (*Ovis canadensis*), but the presence of horses can affect the distribution of native species and their use of the habitat.

The diet of feral burros overlaps a great deal with that of bighorn sheep and uncontrolled burro populations have been predicted to lead to greater competition for forage and a decline in the populations of bighorn sheep and other native animals. Burros have one of the most-inclusive diets of large mammals. Given the climates that their ancestors inhabited, extant burros typically live in the hotter, drier ecosystems of North America. In those systems, rainfall is so scant that annual productivity is very low, and recovery from disturbance has been reported to require decades to centuries, depending on the type, intensity, and duration of the disturbance.

The small reptiles and mammals in the western North American ecoregion that depend on burrows and brush cover to survive and breed are lower in species diversity and less abundant in horse- and burro-occupied sites. These reptiles and mammals are an important component of the ecology of desert systems because they are a link in the food web, and perform numerous critical ecosystem functions (e.g. prey base, nutrient cycling, seed dispersal, insect control).

A variety of management practices have been in use since Congress passed the Wild Free-Roaming Horses and Burros Act in 1971, which guides management of feral horses and burros on Bureau of Land Management (BLM) and U.S. Forest Service lands in the western U.S. Existing management practices include: periodic population counts and rapid assessments of ecosystem status to determine where overpopulation exists; roundups to capture and transport animals; use of contraception to reduce productivity; adoption of animals to private owners; and the humane euthanasia of old, ailing, or unadoptable animals. However, management involving euthanasia, and sometimes roundups, is severely restricted by public opinion. While the public and interest groups express concern for the affected horses and burros, they often fail to consider the conservation of native plants and animals in the ecosystem, and the likelihood that horses and burros will die from starvation, thirst, and exposure when their numbers exceed the carrying capacity of the region.

Due to public opinion, animals passed over for adoption are not euthanized; instead, they are placed into short- or long-term holding facilities. The number of animals adopted annually has declined in recent years, necessitating additional holding facilities. In turn, program costs are rising to unsustainable levels and diverting funding that could be used to manage and sustain habitats for native wildlife. Sound, scientifically-based feral horse and burro management practices should be employed to conserve the highly sensitive arid and semiarid ecosystems of the West and keep taxpayer costs to an acceptable level.

The policy of The Wildlife Society regarding feral horses and burros is to:

1. Encourage the BLM and U.S. Forest Service to place primary emphasis upon the habitat needs of native wildlife and plants when developing, revising, and implementing herd management plans and to include wildlife biologists with differing areas of expertise on planning teams.

2. Encourage the U.S. Fish and Wildlife Service and National Park Service to remove feral horses and burros from all refuges and parks to protect wildlife and their habitat, historic and archaeological resources, and other trust values.

3. Encourage the BLM to eliminate feral horse and burro populations in Herd Areas that have been determined to have insufficient habitat resources necessary to sustain healthy horse populations.

4. Recommend that BLM and other responsible agencies direct adequate attention and resources toward accurately and precisely identifying the impacts of feral horses and burros on wildlife populations, habitats, and other natural resources managed for public benefit by 1) developing and implementing appropriate survey and removal methodology 2) conducting surveys and removals in a timely manner to minimize impacts on natural resources that can result from the overpopulation of feral horses and burros and 3) identifying and mitigating impacts on perennial and ephemeral riparian and wetland habitats, upland habitats, and threatened, endangered, and special status species of wildlife. Inventories should be performed using scientifically-based abundance estimation techniques that quantify population size and associated estimate error.

5. Support the use of roundups to remove feral horses and burros from rangeland while simultaneously seeking opportunities to improve the knowledge and use of the best and most humane capturing and handling methods.

6. Recognize that adoption programs are a socially acceptable method for removal and relocation of feral horses and burros, but that the pool of possible adopters is declining and adoption is not a viable long-term solution to overpopulation.

7. Support euthanasia as a humane method for removal of old, ailing, or unadoptable feral horses and burros and as a possible method to control population size.

8. Recognize that no feral horse or burro management plan should depend solely on fertility control given the uncertainty, logistical difficulty, and great expense that still exist regarding these methods.

9. Support increased funding for scientifically-defensible assessments of ecosystem conditions and interactions between feral horses and burros and native wildlife used to make decisions related to feral horses or burro management. Such assessments should consider the welfare of the feral horses and burros, and the ability of the system to conserve native plant and animal populations and provide ecosystem services such as clean air, clean water, and carbon sequestration.

10. Support the management of feral horses and burros at or below Acceptable Management Levels using a statistically valid sampling methodology. Underestimated populations can hinder management plans and lead to increased levels of resource damage.

11. Discourage the conversion of currently viable, ungrazed native or converted grasslands to pasture lands to house unadoptable horses and burros, privately or publically owned.

12. Cooperate with the conservation and animal-welfare communities to educate the public and key decision makers about the evolutionary history and ecological role of feral horses and burros and the negative impact they have on native vegetation and wildlife, including mammals, birds, reptiles, amphibians, and endangered species.

*The Wildlife Society's **Position Statement on Invasive and Feral Species** states that the Society opposes "introduction or maintenance of invasive species and feral species that threaten the survival of indigenous species" (TWS 2016).*