



THE WILDLIFE SOCIETY

Leaders in Wildlife Science, Management and Conservation

National Wild Horse & Burro
Advisory Board Meeting
Reno, NV
June 28-30, 2023

The Wildlife Society (TWS) thanks the Advisory Board (herein referred to as “the Board”) for the opportunity to provide comments. The Wildlife Society and its network of affiliated chapters and sections represent more than 15,000 professional wildlife biologists, managers, and educators 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 habitat through science-based management and conservation.

The Wildlife Society supports the Bureau of Land Management’s (BLM’s) National Wild Horse and Burro Program and its mission to ensure that healthy herds thrive on healthy rangelands. However, with on-range populations continuing to exceed ecologically sustainable levels, TWS has grown increasingly concerned about the lack of progress in substantially reducing population size. Continued overpopulation of federally managed horses and burros threatens the ecological integrity of landscapes while unduly affecting native species of wildlife and the professionals responsible for managing them. Further, overpopulation results in inhumane conditions for the horses and burros themselves, leading to starvation and lack of water, which is exacerbated by environmental conditions such as the recent drought in the West.

As a result, TWS urges the Board to recognize the dire nature of ecological overpopulation of feral horses and burros by recommending the U.S Forest Service (USFS) and BLM immediately increase the number of animals removed from public lands. This recommendation should be coupled with a corresponding request for the agencies to make plain to Congress the need for adequate resources to increase gathers.

These short-term actions should be paired with long-term investments in the development and implementation of fertility control, adoption incentives, and other novel approaches to maintain Appropriate Management Levels (AML) once reached. These recommendations should be accompanied by a critical evaluation of the BLM’s 2020 management options report provided to Congress.

Bureau of Land Management

The BLM has established an on-range AML of 26,785 federally designated “wild” horses and burros.¹ An AML describes the optimum number of horses and burros that can graze without causing damage to the range, while also taking into account a thriving ecological balance with soil, vegetation, native wildlife, and domestic livestock.² As of March 1, 2023, the population of horses and burros was estimated at 82,883 individuals on BLM Herd

¹ BLM, *Wild Horse and Burro Program Data*. Retrieved June 14, 2023 from <https://www.blm.gov/programs/wild-horse-and-burro/about-the-program/program-data>

² BLM, *Wild Horse and Burro Maintaining Herd Health*. Retrieved June 14, 2023 from <https://www.blm.gov/programs/wild-horse-and-burro/herd-management/maintaining-range-and-herd-health>

Management Areas (HMAs) - triple that of the current AML, and double the 2013 on-range estimates of 40,605.³

U.S Forest Service

The U.S. Forest Service manages federal designated “wild” horse and burro populations across 34 active Herd Territories. USFS estimates that 8,000 wild horses and burros inhabit Forest Service Herd Territories, which have an AML of 2,400 animals.⁴ Based on annual population growth estimates and minimal use of population control measures, current populations likely now exceed 11,000 individuals - four times the AML.

Recommendations

Emphasize need for additional resources - The overpopulation of horses and burros on public lands has directly contributed to the costly degradation of rangeland ecosystems and hampered the ability of wildlife professionals to sustainably manage and conserve native wildlife populations.⁵ Unfortunately, the U.S. Congress has restricted the ability of the BLM and USFS to cost-effectively address this problem. As a result of annual appropriations riders passed by Congress, BLM and USFS do not have the ability to manage these populations as intended under the 1971 Wild and Free Roaming Horses and Burros Act (“the Act”) as amended, leaving the agencies with only limited and costly management tools.⁶

The Wildlife Society encourages the Board to urge the Secretaries of Interior and Agriculture to prioritize science-based management solutions that reduce populations to ecologically sustainable levels as quickly as practical, placing emphasis on permanent removal of excess individuals from rangelands.

While TWS supports the use of fertility control for long-term population management, the BLM's current emphasis on fertility control before bringing populations to AML only serves to slow the existing rate of growth. To reduce on-range populations in a meaningful timeframe, The Wildlife Society recommends the Board request a devotion of federal resources to bring the number of animals on rangelands down to AML within 6-8 years.

While the upfront costs of meaningfully increasing the number of gathers will be significant, these resources will not be required indefinitely. Pairing a short-term emphasis on removal of individuals from the range with a long-term emphasis on fertility control solutions will provide a mechanism for population reduction then stabilization.

Undertake a critical review of BLM 2020 Report - The BLM's 2020 report to Congress should be evaluated and considered by the Board for scientific rigor and feasibility.⁷ At present, the BLM is prioritizing resources to maintain herds that are already at AML. Because HMAs at AML have relatively few horses, this management approach leads to an over-allocation of resources in areas with the fewest horses, while HMAs over AML

³Program Data, *supra*

⁴USFS, *US Forest Service Wild Horse and Burro Territories*. Retrieved June 14, 2023, from <https://www.fs.usda.gov/wild-horse-burro/territories/index.shtml>

⁵National 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

⁶The Wild Free-Roaming Horses and Burros Act of 1971 (2006), available at https://www.blm.gov/sites/default/files/programs_wildhorse_history_doc1.pdf

⁷BLM, *Report to Congress: An Analysis of Achieving a Sustainable Wild Horse and Burrow Program* (2020) available at <https://www.blm.gov/sites/blm.gov/files/WHB-Report-2020-NewCover-051920-508.pdf>

continue to degrade. For example, Nevada accounts for nearly 60% of all free-roaming horses and burros on HMAs managed by the BLM, but HMAs in the state received less than 40% of gather funds in FY 2022.⁸ Reductions in budget can further amplify this issue, reinforcing the need for the Board to urge the BLM to seek additional funds. The Wildlife Society recommends a critical review of the BLM 2020 report to ensure the BLM is using the document to support adequate resource dedication for problem areas.

Continued support for adoption incentives and other creative approaches - Despite the BLM's inability to implement all the management tools originally envisioned in the Act, the agency has made inroads in finding novel ways to move animals out of federal care. One such novel approach is the expansion of opportunities to adopt horses and burros under BLM care. Historically, rates of adoption and sales have not kept pace with growth of on-range populations. However, initiatives such as the Adoption Incentive Program have increased public engagement. In 2022 alone, the BLM placed 7,793 horses and burros into private care. The Wildlife Society encourages the Board to support the continued creation and use of programs and incentives that promote the removal of horses and burros from federal rangelands and minimize the suffering of unwanted and unadoptable animals.

Conclusion

The Wildlife Society requests the Board emphasize the need for the BLM and USFS to have the resources required to utilize the full suite of management tools currently available, with emphasis on robust gathers over the next 6-8 years to achieve AML. Without a significant and immediate increase in the rate of removal, coupled in the long-term with the use of adoptions, fertility control, and other novel approaches, these populations will continue to expand and our nation will witness the continued degradation of ecologically important and unique rangeland ecosystems.

Thank you for considering the views of wildlife professionals. We invite your questions regarding this important issue. Please feel free to contact Caroline Murphy (cmurphy@wildlife.org), government relations manager at TWS with any questions.

Sincerely,

Bob Lanka, CWB®
President-Elect
The Wildlife Society

⁸Program Data, *supra*