THE WILDLIFE SOCIETY

Leaders in Wildlife Science, Management and Conservation

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The Wildlife Society (TWS) thanks the National Wild Horse & Burro Advisory Board for the opportunity to provide comments. Founded in 1937, The Wildlife Society and its network of affiliated chapters and sections represent thousands of 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 appreciates federal agencies' efforts to sustain healthy public lands. Nevertheless, the persistent surpassing of ecologically established on-range population targets and the failure of the agencies to significantly decrease "wild" horse and burro populations is cause for concern among wildlife professionals. The sustained overpopulation of federally managed, and ecologically feral, wild horses and burros on public lands jeopardizes ecological integrity, negatively affecting native wildlife species and the ability of resource managers to conserve rangeland resources for succeeding generations.

Consequently, TWS requests the Advisory Board recommend the USFS and BLM do everything they can to expedite the removal of excess animals from public lands to align with Appropriate Management Levels (AML), which were established through a public process.

TWS recognizes and appreciates the budgetary, political, and logistical challenges facing the agency. We commend the agencies for exploring innovative strategies and new ideas. We advocate for thoughtful consideration and implementation of additional measures to achieve and sustain populations at AML in the near future in order to prevent continued ecological degradation.

Bureau of Land Management and U.S Forest Service

The BLM has set an on-range AML at 26,785 for federally designated wild horses and burros in 177 Herd Management Areas covering nearly 32 million acres of public lands across 12 states. AMLs, established through the public resource management plan processes, identify the number of these animals that can graze without harming rangeland health, in balance with wildlife and permitted numbers of domestic livestock. As of March 1, 2023, the nationwide population is estimated to be 82,883 individuals on BLM-managed public lands—three times the existing AML, twice the on-range estimates from 2013 (40,605), and an additional 500 animals from Fiscal Year 2022.

The U.S. Forest Service oversees federally designated wild horse and burro populations in 53 Herd Territories that cover 2.5 million acres of USFS-managed public land. In the most recent figures available, the USFS estimated that 8,000 wild horses and burros resided in these territories, despite a population target of 2,400 animals.

RECOMMENDATIONS

On-Range Populations: Aggressively reduce them to protect ecosystems

TWS encourages the use of roundups as a practical and humane means to remove horses and burros from public lands in a timely and cost-effective manner. Removing animals from the rangeland is the only way to immediately reduce on-range populations and prevent further degradation of the ecosystem. Simultaneously, TWS calls for continuous refinement of knowledge and application of the best and most humane capturing and handling methods.

The presence of ecologically feral horses and burros on public lands, regardless of their legal designation as "wild", and especially their continued surpassing of population targets established to protect the land, poses a significant threat to the ecological balance and conservation efforts led by wildlife professionals. Free-roaming horses and burros are products of generations of human-selected breeding and do not fulfill a natural role in North American ecosystems. Horses and burros degrade rangeland ecosystems through destructive behaviors such as trampling vegetation, overgrazing, and soil compaction. The severity of these impacts depends on factors such as herd density, duration of use, timing, and the area's health, with high-density areas experiencing substantial harm.

Areas occupied by overpopulations of horses and burros typically exhibit reduced plant species diversity, diminished plant cover, and an increase in invasive plant species. These negative effects cascade to wildlife, including small mammal and reptile populations, leading to lower abundances in areas inhabited by these herds. Furthermore, aggressive behavior exhibited by horses and burros around watering holes and grazing sites excludes native wildlife such as elk and bighorn sheep.

These ecological impacts are not limited to legally designated "wild" horses and burros. The Wildlife Society advocates for an exhaustive and proactive strategy in managing all feral horse and burro populations, emphasizing the need for collaboration with key agencies. **TWS urges federal agencies to take decisive action by removing these animals from all refuges, parks, and all other natural areas where free-roaming horses and burros are not legally permitted under federal law.** This stance is driven by a commitment to safeguarding wildlife, conserving habitats, and protecting historical and archaeological resources that contribute to the nation's ecological and cultural heritage.

Overgrazing by horses and burros poses a critical threat, disrupting the delicate balance of ecosystems and impacting biodiversity, soil health, and water retention while compromising crucial plant species. This subsequent habitat degradation directly jeopardizes the well-being of native wildlife, compromising their food sources and shelter.

Off-Range Pastures: Limit their growth to protect native grasslands

Ecological impacts from horses and burros occur wherever they graze and roam. In light of that, **The Wildlife Society strongly discourages the conversion of currently viable, un-grazed**

native or converted grasslands into pasture lands for the housing of horses and burros, whether privately or publicly owned. This recommendation underscores the imperative to prioritize the preservation of natural habitats to mitigate the adverse effects of overgrazing on ecosystems and maintain the ecological integrity of these vital landscapes.

Fertility control: Implement effective, long-lasting options—especially sterilization—to maintain populations after achieving AML

TWS underscores the need to investigate and implement long-lasting and permanent sterilization solutions. The integration of both short- and long-term fertility control in combination with periodic gathers offers a comprehensive approach to population stabilization, subsequent reduction to AML and maintenance at those levels. However, TWS is concerned that the current emphasis on short-term fertility control may not lead to a meaningful reduction in on-range populations within an appropriate time frame.

Fertility control measures can be more effective at maintaining populations at AML, once populations have been reduced to that level. When populations reach beyond the AML, allocating large swaths of time and resources to short-term fertility control becomes less pragmatic, and the likelihood of success becomes more remote. At such levels, the urgency to stabilize and reduce populations necessitates a more comprehensive approach. **Therefore, prioritizing removal of animals from the range becomes crucial for achieving meaningful and timely reductions in on-range populations and preserving the ecological integrity of the affected areas.**

Adoptions: recognize the limited potential

An optimal approach to on-range population management involves a sustained effort which will increase off-range populations. Currently, the agencies' primary means of managing off-range population levels (and associated costs) has been through private adoption and restricted sale. However, the rates of adoption and sales have failed to keep pace with the growth of on-range populations, underscoring the challenge of effective off-range management in the absence of significant public interest in privately housing animals. Notably, initiatives such as the Adoption Incentive Program have successfully elevated public engagement. In 2023, BLM placed 8,000 horses and burros into private care, and adoption programs continue to serve as a socially acceptable method for removing and relocating animals. **However, the pool of potential adopters is limited and not able to meet the current need, rendering adoption alone an unsustainable long-term solution to horse and burro overpopulation.**

Recognizing the complexities of managing populations, **TWS acknowledges euthanasia as a humane method for the removal of old, ailing, or unadoptable horses and burros.** This acknowledgment underscores the importance of considering all available options for population control to maintain the health of the animals and the ecological balance of the habitats they inhabit. **We recommend the advisory board express the need for the option of euthanasia to the Secretaries and relevant congressional committees.** The Wildlife Society's

recommendations reflect a commitment to science-based, and ethically sound approaches to address the challenges posed by horse and burro populations across the landscape.

Conclusion

Without a substantial increase in the rate of removal and the implementation of long-term fertility control for horses and burros, populations will continue to expand, doubling in size every 4 to 5 years until rangeland systems occupied by these animals ecologically collapse. This trajectory poses a significant threat to native wildlife and will further escalate the degradation of the nation's ecologically vital and distinctive rangeland ecosystems.

The Wildlife Society strongly urges the Board to acknowledge the urgent nature of the ecological overpopulation of feral horses and burros. TWS recommends that both the USFS and BLM allocate sufficient resources for research and the implementation of long-term fertility control measures and annually remove enough of the population from rangelands to functionally reduce populations over time—and ensure the protection of diverse ecosystems.

Additionally, The Wildlife Society advocates for a thoughtful evaluation of reducing the number of horses and burros in facilities resulting from past roundups. Emphasizing the importance of utilizing the full spectrum of management tools as stipulated by the 1971 Wild Free-Roaming Horses and Burros Act, TWS urges the Board to critically evaluate the BLM's 2020 report to Congress for scientific rigor and feasibility, ensuring a comprehensive and effective approach to the ecological challenges posed by feral horse and burro populations.

Additional Resources

- Documentary film: Horse Rich, Dirt Poor
- TWS' Issue Statement on Feral Horses and Burros
- TWS' Fact Sheet on Feral Horses and Burros

Thank you for considering the views of wildlife professionals. We invite your questions regarding this important issue. Please feel free to contact Tom Klein (Tklein@wildlife.org), government affairs associate at TWS with any questions.

Sincerely,

Certified Wildlife Biologist®
President | The Wildlife Society