



THE WILDLIFE SOCIETY

Leaders in Wildlife Science, Management and Conservation

National Wild Horse & Burro
Advisory Board Meeting
October 9-11, 2018

Contact: Caroline E. Murphy, AWB®
Government Relations Program Coordinator
cmurphy@wildlife.org, 301-897-9770 x 308

The Wildlife Society thanks the Advisory Board for the opportunity to provide comments today. The Wildlife Society, founded in 1937, represents over 10,000 professional 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 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.¹ However, with on-range populations continuing to dramatically exceed ecologically sustainable levels, The Wildlife Society grows increasingly concerned about the Administration's lack of progress in implementing management options targeted at reducing population size. The continued overpopulation of federally managed horses and burros on public lands threatens the ecological integrity of our 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 recognize the dire nature of ecological overpopulation of feral horses and burros by recommending the U.S. Forest Service and BLM direct adequate resources towards removing enough horses and burros from rangelands each year to conserve our ecologically diverse rangelands and measurably improve currently degraded areas. The Advisory Board's recommendation should be accompanied by a critical evaluation of the BLM's spring 2018 management options report provided to Congress. Further, The Wildlife Society encourages prudent consideration of reducing the number of horses and burros held in facilities from previous roundups.

Bureau of Land Management

The BLM has established an on-range Appropriate Management Level (AML) of 26,690 federally designated "wild" horses and burros.² An AML describes the optimum number of horses and burros that can graze without causing damage to the range while also taking into account maintaining a thriving ecological balance with wildlife, domestic livestock, and vegetation.³ As of March 1, 2018, BLM estimates that on-range wild horse and burro populations are at approximately 82,000 individuals—over three times greater than the AML.⁴ With an estimated annual population growth rate of 15–20%,⁵ and barring any large-scale removal effort, wild horse and burro populations could surpass 90,000 by spring 2019. In the absence of implementing 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.^{5, 6}

¹ BLM, *About the Wild Horse and Burro Program*. Retrieved October 7, 2018, from <https://www.blm.gov/programs/wild-horse-and-burro/about-the-program>.

² BLM, *Wild Horse and Burro Program Data*. Retrieved September 27, 2018 from <https://www.blm.gov/programs/wild-horse-and-burro/about-the-program/program-data>.

³ BLM, *Wild Horse and Burro Maintaining Range and Herd Health*. Retrieved September 27, 2018 from <https://www.blm.gov/programs/wild-horse-and-burro/herd-management/maintaining-range-and-herd-health>.

⁴ Program Data, *supra*.

⁵ 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.

⁶ BLM, *Management Options for a Sustainable Wild Horse and Burro Program* Report to Congress (2018) available at https://www.blm.gov/sites/blm.gov/files/wildhorse_2018ReporttoCongress.pdf.

U.S. Forest Service

The U.S. Forest Service (USFS) also manages federally designated “wild” horse and burro populations across 34 Herd Territories.⁷ 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.⁸ Based on annual population growth estimates and minimal use of population control measures, current populations likely now exceed 12,000—more than five times the AML.

Recommendations

The overpopulation of horses and burros on public lands has directly contributed to degradation of rangeland ecosystems and hampered the ability of wildlife professionals to sustainably manage and conserve native wildlife populations.⁹ For these reasons, The Wildlife Society encourages the Advisory Board to support and prioritize 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.** The tools that the BLM hopes to implement, as laid out in their spring 2018 report to Congress,¹⁰ should also be evaluated and considered by the Board for scientific rigor and feasibility in application prior to agency implementation.

As outlined in the report to Congress, a large increase in gathers is one of the population control mechanisms being explored by the BLM.¹⁰ The Wildlife Society strongly encourages the Advisory Board to recommend that the BLM work to reduce the number of horses and burros on the range in part by increasing the number of animals gathered and removed to achieve AML in a reasonable amount of time.

According to the BLM’s report, the success of these large-scale gathers is contingent upon aggressive application of fertility control measures – particularly permanent, surgical procedures.¹⁰ 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. Our organization believes sterilization is preferred over the currently available fertility control vaccine, porcine zona pellucida (PZP), which has proven unsuccessful as a long-term solution due to its short-lived effectiveness (up to 22 months).¹¹

An increase in use of on-range fertility control and gathers paired with an increase in off-range adoptions, as outlined in Option 4 of the BLM’s report, could provide a mechanism for population reduction. However, this route will require a massive initial investment in federal funds for on-range activities, as well as a public interest in horse and burro adoption that is not currently present.

⁷ USFS, *About the Wild Horse and Burro Program*. Retrieved September 27, 2018, from <https://www.fs.fed.us/wild-horse-burro/aboutus.shtml>.

⁸ USFS, *US Forest Service Wild Horse and Burro Territories*. Retrieved September 27, 2018, from <https://www.fs.fed.us/wild-horse-burro/documents/territories/USFSWildHorseBurroTerritories2014.pdf>.

⁹ 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>.

¹⁰ Management Options, *supra*.

¹¹ NAS, *supra*.

In the past, the removal of excess horses and burros through gathers and eventual adoptions helped maintain the ecological health of rangelands.¹² However, sharp declines in adoption rates combined with recent Congressional restrictions on using humane euthanasia and unrestricted sale of gathered horses has led to ~46,000 horses and burros living in off-range holding facilities at a cost of \$50 million per year.¹³ Since the peak of wild horse and burro adoptions in 1987 (12,776), annual adoption rates have declined by nearly 80%, with BLM only managing to adopt out 4,209 horses and burros in FY 2017.¹³ Even if adoptions increase back to their maximum historic level, it would not even account for annual population growth of the on-range animals.¹³ Without the public interest in adopting these animals, an increase in funding for gathers will simply result in a ballooning off-range population well above 46,000 individuals, with all other available options to unload excess individuals restricted by Congress.

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 restrictions currently placed on several management activities authorized by the Wild Free-Roaming Horses and Burros Act of 1971, as amended, to allow for better management of herds, and ultimately reduce the growing burden on the BLM and place taxpayer dollars into more fruitful and effective on-range conservation efforts.¹⁴

The Wildlife Society supports the desire for the well-being and humane treatment of horses and burros in all management actions. We also recognize that taking no action regarding on-range horse and burro populations represents one possible management decision. However, continuing to follow this path will 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.¹⁵

In addition to representing an inhumane way of managing horse and burro populations, taking no management actions also ignores 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, domestic livestock, wildlife, and vegetation.¹⁶ 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.

¹² U.S. Government Accountability Office, *Bureau of Land Management: Effective Long-Term Options Needed to Manage Unadoptable Wild Horses* 3 (2008), available at <http://www.gao.gov/assets/150/149472.pdf>.

¹³ Program Data, *supra*.

¹⁴ 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.

¹⁵ NAS, *supra*.

¹⁶ 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 resources towards removing enough horses and burros from rangelands each year to conserve our ecologically diverse rangelands and measurably improve currently degraded areas. The Advisory Board's recommendation should be accompanied by a critical evaluation of the BLM's spring 2018 management options report provided to Congress. Further, The Wildlife Society encourages prudent consideration of reducing the number of horses and burros held in facilities from previous roundups.

Thank you for considering the views of wildlife professionals. We invite your questions regarding this important issue. Please feel free to contact Caroline Murphy, government relations program coordinator, at cmurphy@wildlife.org or (301) 897-9770 x 308.

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