



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*

11 May 2015

U.S. Department of the Interior
Bureau of Land Management
1849 C Street NW.
Room 2134LM
Washington, DC 20240
Attention: Jean Sonneman
Jean_Sonneman@blm.gov

Attn: 1004-NEW
Docket No. 2015-05623

Re: Comments for the Bureau of Land Management Proposed Collection of Information on Wild Horses and Burros, Knowledge and Values Study

Dear Jean Sonneman,

The National Horse & Burro Rangeland Management Coalition appreciates the opportunity to submit comments to the proposed knowledge and values study regarding the management of wild horses and burros by the BLM. The National Horse & Burro Rangeland Management Coalition includes a wide range of sportsmen's, livestock, wildlife, and land conservation organizations and professional societies. Collectively, we represent millions of Americans and focus on commonsense, ecologically-sound approaches to managing horses and burros to promote healthy wildlife and rangelands for future generations.

The coalition is supportive of efforts to better enable the BLM's Wild Horse and Burro program to manage healthy herds on healthy ranges for a variety of stakeholder use. We offer the following suggestions in order to enhance the quality and utility of information collected during the study, and specifically from the valuation exercise included in both the focus group and interview draft guides.

While the focus group and interview guides have introduced some of the complex background and management challenges faced by the BLM's Wild Horse and Burro Program, we believe several pieces of information should be included to better inform participants during the valuation exercise.

The focus group and interview guides fail to establish an understanding of the extent to which horse and burro populations currently exceed appropriate management levels (AML). The primary threat to both rangeland ecosystems and horse and burro health is overabundant

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Masters of Foxhounds Association • Mule Deer Foundation • National Association of Conservation Districts
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
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populations, and management decisions should not be made abstractly without regard to current and future on-the-ground circumstances. Therefore, **both the AML of less than 27,000 individuals and current estimated population levels (exceeding 49,000 individuals in March 2014) should be presented to participants** as context for decision-making and allocation of funds during this exercise.

We are also concerned about the exclusion of viable management options within the drafted valuation exercises. The emphasis on population growth suppression methods, which cannot alone sufficiently reduce populations to the AML in a reasonable amount of time, inadequately addresses the breadth of management options for horse and burro populations. Though currently restricted by appropriations language, **humane euthanasia and/or selling of horses are viable management options that should be provided to focus group and interview participants.** Such options would relieve the BLM from huge costs of maintaining facilities and caring for horses for the duration of their lifetime. Focus group and interview administrators should be able to provide participants with the approximate number of horses the BLM would be able to remove and humanely euthanize or sell if allocated a hypothetical \$10 million so the BLM and Congress may fully understand stakeholder preference for various management options.

The coalition also offers several alterations to current representation of management options in valuation exercise included in the draft guides.

- **Population growth rates (i.e., horse populations estimated to double every four years) are relevant to multiple management options**, not just removal, and should be reiterated with each management option so participants may understand the frequency of control method reimplementation.
- Selective removals of female mares may be more effective at reducing population sizes than indiscriminate removal of horses, which is currently presented in the draft guides. Within the removal option, we suggest **adding language that makes clear that strategic removal of mares can stall population growth beyond reducing on-range population levels by 200 individuals.**
- Language should also be **added to the “Remove” management option that states “enough horses will be left on the range to maintain a healthy population size.”** This will maintain similarity and fair comparison to the other presented management options.
- An option should be added that includes the adoption of horses after removal. Though not a larger number of horses are adopted each year, **adoption is certainly part of the toolbox and should be represented as part of the removal management option.**
- Our nation’s rangelands are currently being degraded by the overpopulation of horses and burros, and we have a dire need to achieve AML as quickly as possible. **Each management option should include information on how long it would take to achieve AML of less than 27,000 animals.** This element should be a critical component of BLM’s management decisions.

Given the draft valuation exercises' emphasis on economic cost of active horse and burro management - essentially measuring stakeholder and taxpayer willingness to pay for management options - we suggest a revised method of representing costs. **Costs should additionally be displayed as the lifetime costs per horse for each management option.** Such numbers would allow for more clear comparisons between management options and provide for more informed and better decision-making. As both sterilization and removal have lifetime effectiveness, these cost estimates can be made through simple division; the estimated costs for a single mare receiving yearly contraceptive treatments based on the typical life-span for an individual persisting on the range should also be calculated and presented.

We are encouraged by the BLM's efforts to improve its management of wild horse and burro populations by including the values of stakeholders and the general public in its decision-making processes. We look forward to working with the BLM to find solutions that will achieve the goal of healthy herds on healthy rangelands.

Thank you for considering the input of our coalition.

Sincerely,

A handwritten signature in black ink that reads "Keith Norris". The signature is written in a cursive, flowing style.

Keith Norris
Chair, National Horse & Burro Rangeland Management Coalition

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