



## 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*

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**DATE:** 15 October 2015

**TO:** Members of the United States Congress

**RE:** Federal agency management of wild horses & burros and our concerns for rangeland health due to extreme overpopulation on our public lands

The National Horse & Burro Rangeland Management Coalition requests action to improve management of our nation's wild horses and burros. We believe the current inability of the Bureau of Land Management and U.S. Forest Service to properly manage the wild horses and burros, combined with the restrictions on management options by Congress, have created a dire situation that risks the health of our public rangelands, wildlife, wild horses, livestock, and all other multiple uses of the range.

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 over 8 million Americans and focus on commonsense, ecologically-sound approaches to managing horses and burros to promote healthy wildlife and rangelands for future generations.

Attached to this letter is the testimony our Coalition submitted to the National Wild Horse and Burro Advisory Board in September 2015. Our testimony highlights:

- our request for **healthy rangelands and support for the multiple-use mandate of public lands**. Wild horses and burros are part of that mandate but excess populations unduly impact all other uses.
- the problems caused by the **>65,000 horses and burros that are currently on our public lands. Populations exceed appropriate management levels by over 115%**. Our public lands designated for horses and burros can only support ~30,000 animals.
- the history and future trajectory of horse & burro populations, **which grow at 18-20% each year and double in size every 4 years**. This rate of growth puts our wildlife and rangeland ecosystem at further risk of degradation.

We ask Congress to address this urgent problem for our nation's valuable rangelands. Please contact our Coalition to further discuss this issue and potential solutions.

Sincerely,

Keith Norris  
Chair, National Wild Horse & Burro Rangeland Management Coalition  
[keith.norris@wildlife.org](mailto:keith.norris@wildlife.org); 301.897.9770 x309

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Masters of Foxhounds Association • Mule Deer Foundation • National Association of Conservation Districts  
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DATE: 3 September 2015

TO: National Wild Horse & Burro Advisory Board

RE: Public testimony calling for the BLM to manage horses & burros at Appropriate Management Levels to protect the rangeland ecosystem

FROM: National Horse & Burro Rangeland Management Coalition  
Keith Norris, Chair, [keith.norris@wildlife.org](mailto:keith.norris@wildlife.org), 301-897-9770 x 309

The National Horse & Burro Rangeland Management Coalition appreciates the opportunity to submit testimony to the National Wild Horse & Burro Advisory Board. 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.

### **Healthy Rangelands**

Our Coalition prioritizes the health of the public's rangelands above all other considerations. ***Healthy rangelands are where native wildlife can thrive and livestock can graze to support local communities, free-ranging horses and burros can live successfully, and water quality can be sustained.*** Healthy rangelands can rebound from moderate disturbance naturally, and in a timely manner; habitat quality is sustained and natural growth processes are enabled. Healthy rangelands are critical to the future of the Western way of life.

The current overpopulation of horses and burros is degrading the health of our rangelands, and the growth of horse and burro populations has the potential to continue to damage our rangelands beyond their ability to recover.

Horses and burros are known to compact rangeland soils and graze vegetation extremely low to the ground, reducing the plant's ability to re-grow. The extreme grazing of native vegetation and compaction of soils can result in desertification of the range, particularly in the current drought situations being experienced in parts of the West.

***Horses and burros compete with native wildlife for resources and impact habitat conditions for those species.*** Over 30% of Herd Management Areas (9.9 million acres) overlap with greater sage-grouse habitat. The impact of unmanaged horse and burro populations on sage-grouse habitat is potentially thwarting efforts to conserve this species and prevent its listing under the Endangered Species Act.

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Our coalition is greatly concerned about the exponentially growing population of wild horses and burros on our nation's rangelands and the lack of support and effort by the BLM and Forest Service to reduce the threat this poses to our nation's rangelands.

### **Population Increases & Lack of BLM Effort to Manage**

As of March 1, 2015, wild horse and burro populations surpassed 58,000 animals on BLM-rangelands. This threshold exceeds the BLM estimated ecologically-sustainable level of 26,715 horses and burros by more than 31,000 - that means wild horses and burros on our nation's rangelands already exceed capacity by 118% for appropriate range management.

This extreme level of overpopulation of horses and burros negatively impacts the country's rangelands, risking the future of the ecosystem. By continuing to allow horses and burros to exceed sustainable levels, the future of wildlife, rangelands, livestock operations, rural communities, and the horses and burros themselves is in jeopardy.

***The focus of the BLM Wild Horse & Burro program should revert to its original purpose and stated goal of achieving appropriate management levels (AMLs). Direct removal of horses and burros from impacted regions will aid in achieving AMLs while simultaneously reducing the horses' and burros' impact on the supporting ecosystem.***

The BLM has removed only 2,212 animals in FY2015 and the President's FY 2016 Budget Proposal plans for the removal of only 2,000 horses and burros from the country's rangelands next year. Unfortunately, this number of removals does very little to protect our nation's rangelands from the growing negative impacts of overpopulated horses and burros.

Wild horse populations typically grow by 20% per year and double in size every 4-5 years. At the current rate, the wild horse population will likely grow by 9,000 animals by 2016, even with the planned removal of 2,000 horses. As a result, we could see as many as 67,000 wild horses and burros degrading the country's rangelands by 2016 – exceeding capacity by 150% for appropriate rangeland management. This is an unacceptable rate of increase for a population that already greatly exceeds AMLs. Such population numbers will continue to cause an unacceptable level of damage to a valuable asset for our country.

We appreciate the BLM's increased attention to fertility control methods, as we believe that scientifically-based use of fertility control (*e.g.*, proven to be effective and safe) can be an important component to the solution to this problem. However, fertility control is problematic (see attachment), does not solve the problem, and should not be the primary approach. There are currently 75 of 179 (42%) Herd Management Areas (HMA) that are more than double AML, including 41 (23%) that are triple AML. Fertility control methods, even if they are effective in reducing pregnancies, will only help maintain population levels in the short term, not reduce

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them. Direct removal of excess wild horses and burros from the range is the only way to achieve AMLs in a reasonable amount of time.

### **Forest Service Management**

The Forest Service is also charged with managing horses and burros. Population estimates on Forest Service Herd Territories indicate ~7,400 horses and burros as of February 14, 2014, with an AML of 2,250. Due to minimal population growth suppression and removal of horses from the rangelands, the current population is likely greater than 10,000 animals. Additionally, the AML estimate has not been revised since the 1970's – and has likely decreased due to ongoing drought situations in the West.

### **Horses vs. Livestock and Other Uses of Public Rangelands**

The BLM and the Forest Service are required by law to manage our nation's public lands for multiple uses. These uses range from hunting, wildlife watching, timber harvesting, mining, livestock grazing, camping and other recreational uses. All of these uses are managed by the BLM and Forest Service to ensure a proper balance with other uses and to minimize impact to the ecosystem while maximizing public utility of our land. If regulations regarding these activities are not followed, consequences (*e.g.* fines) are imposed on the users.

Wild horse and burro management is also part of the multiple use mandate for some of our public lands, as outlined in the Free-Roaming Wild Horse & Burro Act of 1971. However the lack of adequate management of this activity (*i.e.* horse and burro grazing) has resulted in a situation where horse and burro populations are exceeding their allocated use of the rangeland. As a result, the horse and burro populations are unduly impacting all other uses of public lands and greatly impacting the rangeland ecosystem.

Some groups wish to argue that we should remove all livestock from the range, and doing so would allow horse and burro populations to remain at higher levels. We oppose this perspective. Livestock impact our public rangelands very differently than horses. Livestock do not forage vegetation as low to the ground as horses do, and do not act as aggressively toward wildlife.

***Most importantly, livestock are managed by the BLM, Forest Service, and ranchers.*** Their grazing numbers are regularly adjusted to respond to changing rangeland conditions allowing for enhanced habitat and environmental conditions while preventing any long-term damage.

Even without any livestock on rangelands, the horse and burro management situation would be unsustainable. Horses and burros have very few natural predators that overlap their range. As a result, we would still face a situation where the BLM and Forest Service would need to manage the horse and burro populations to protect the range and prevent self-limitation of the populations via starvation and dehydration. (See enclosures)

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### **Preservation and Humane Treatment of Horses and Burros**

We are not advocating for the removal of all horses and burros from our country's public rangelands. We recognize that these animals, although not native, are protected by federal law and are an iconic species of the West. ***We believe they can and should be a part of the multiple-use mandate of the BLM and Forest Service.*** However, continuing down this path of overpopulation is detrimental to everything that relies upon the rangelands to survive – including the horses, native wildlife, and people. The health of the rangeland must be the top priority in order for everything else that depends on the rangelands to survive and flourish.

Overpopulation of the horses and burros will ultimately result in a situation of self-limitation. The horses and burros will degrade the habitats and deplete resources to the point where the population will face starvation and dehydration. The ongoing extreme drought situation through much of the West is turning this potential situation into a reality. The current approach is an irresponsible and inhumane way to manage wild horses and burros. We can correct this situation by removing excess animals from the rangelands and managing wild horse and burro populations in balance with the rangeland ecosystem – at AMLs.

### **Conclusion – Increase Rate of Removal**

Without an increase in the rate of removal of horses and burros – to the order of 10,000-12,000 per year in addition to fertility control efforts - populations will continue to expand and our nation will witness growing degradation to its rangeland ecosystem.

**We urge this Advisory Board to recognize the dire situation and address this increasing problem for our nation's valuable rangelands by requesting the BLM and Forest Service remove horses at a rate substantial enough to produce impactful results and protect our natural resources.**

Thank you for considering the input of our coalition. We invite your questions regarding this issue. Please feel free to contact our current Chair, Keith Norris at [keith.norris@wildlife.org](mailto:keith.norris@wildlife.org) or 301-897-9770 x 309.

Enclosed:     Figure "Removals, Adoptions, On-Range and Off-Range Populations"  
                  Figure "On-range Management"  
                  Figure "On-range population growth"





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**Removals, Adoptions, On-Range, and Off-Range Populations  
of Horses and Burros on BLM lands**

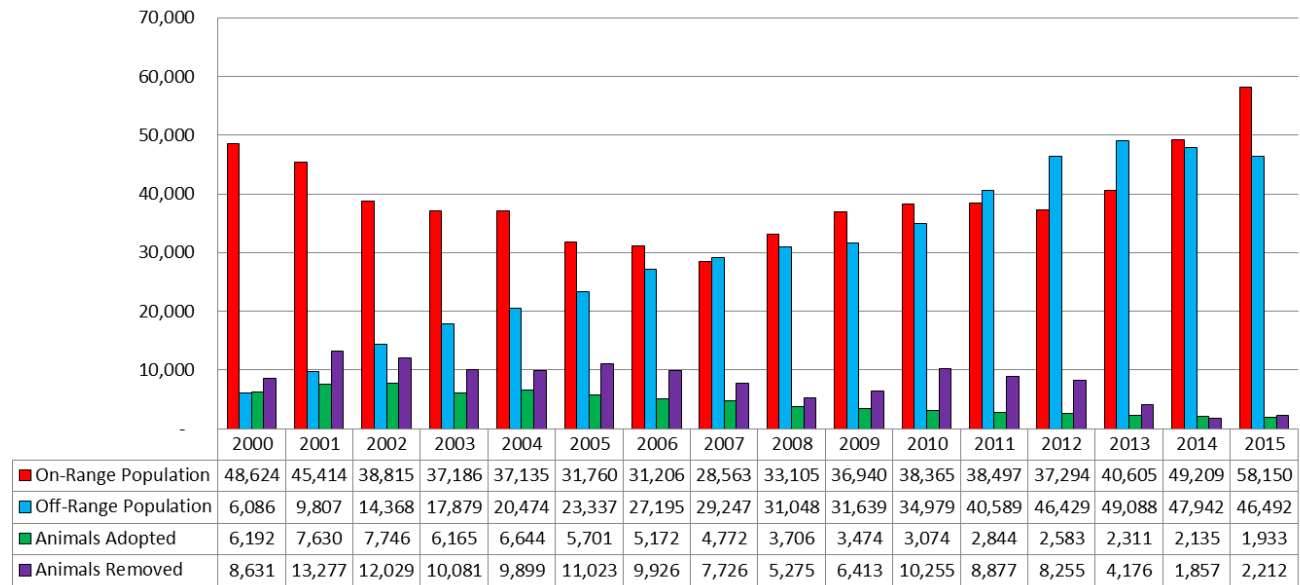


Figure adapted from a BLM Presentation on Wild Horse and Burros and updated with current numbers

The BLM’s attempts to appropriately manage the wild horse and burro populations in balance with other rangeland uses were nearly successful from 2000-2007. The agency was removing >7,000 each year, and reducing the on-range population in order to achieve an Appropriate Management Level of approximately 26,700 animals.

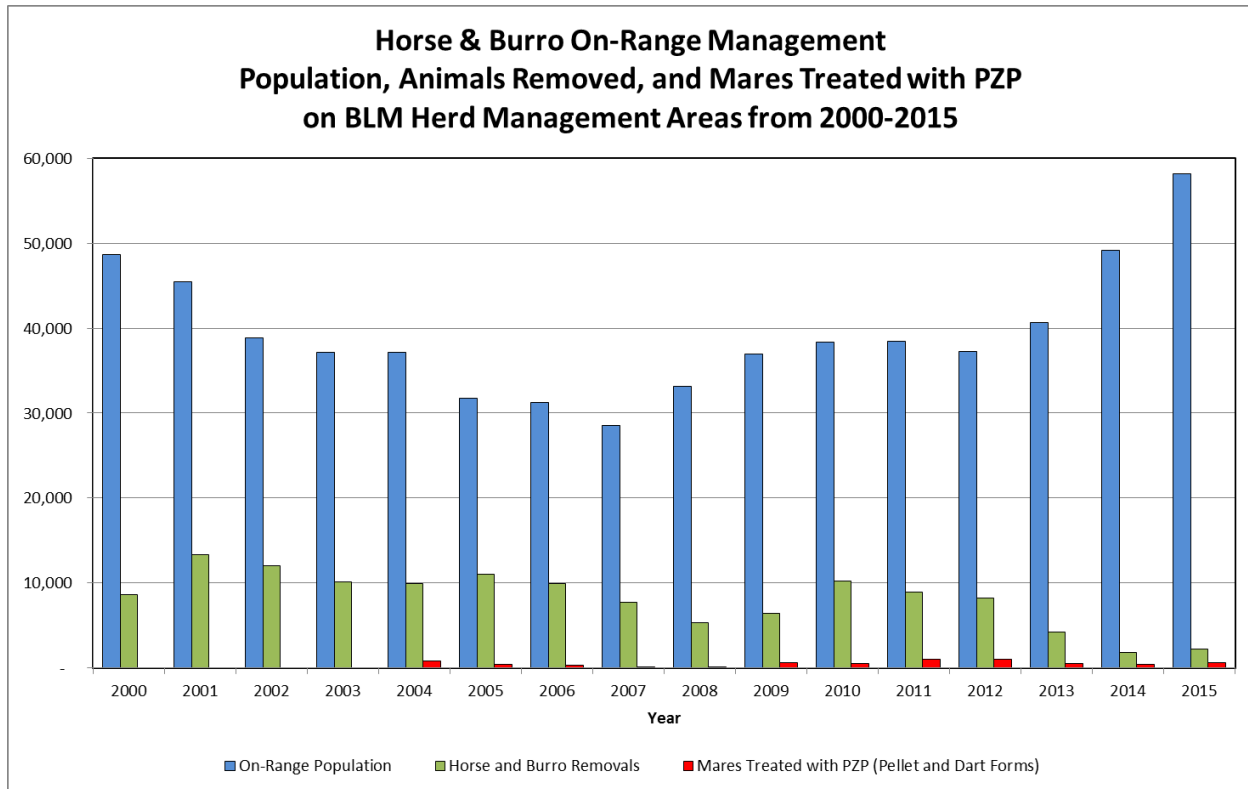
Unfortunately the program began to fail in 2008. After 7 subsequent years of population reduction, the horse and burro on-range population began to grow – and hasn’t stopped, due to the reduced efforts by the BLM to remove horses. The BLM is now removing only ~2,000 animals per year. Reductions in efforts to remove horses were caused in part by litigation, lack of capacity in holding facilities, and limited funding available to pay for holding costs.

In 2014, the nation found itself back with nearly the same on-range population it had in 2000 – the only change is now the taxpayer has to support 45,000+ more horses and burros in off-range holding facilities at an annual cost exceeding \$40 million.

The rate of animals being adopted is not keeping up with the growth of the population. Only ~2,000 horses are being adopted each year, while the population is growing by 18-20% (~11,000) each year. Adopting animals is clearly not going to solve the problem.



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Fertility control was first initiated in 2004 alongside extensive efforts to remove horses from the range. The combination of these efforts resulted in populations that continued to move toward appropriate management levels. However, as efforts to remove horses and burros from the range have waivered, fertility control applications have done little to curb population growth.

Fertility control efforts can be expensive and challenging to apply in many situations. Skittish horses in most management units do not allow for remote darting application, and require intensive effort to gather horses in order to apply the drugs. PZP currently needs to be applied every 1-2 years in order to remain effective. Gathering horses every two years just to administer PZP is impractical and virtually impossible as horses become more difficult to capture with each gather. Mares treated with PZP are often in better body condition – which results in more successful reproduction and faster growth of the population once the drugs have worn off.

The BLM has initiated several research projects that evaluate the effectiveness and impacts of various population growth suppressant methods. We are encouraged by this research. However, it will likely be 3-5 years until the results of these research projects are known and can be implemented throughout all HMAs. The horse and burro population will likely exceed 100,000 animals by that point –a dire situation for the rangelands.



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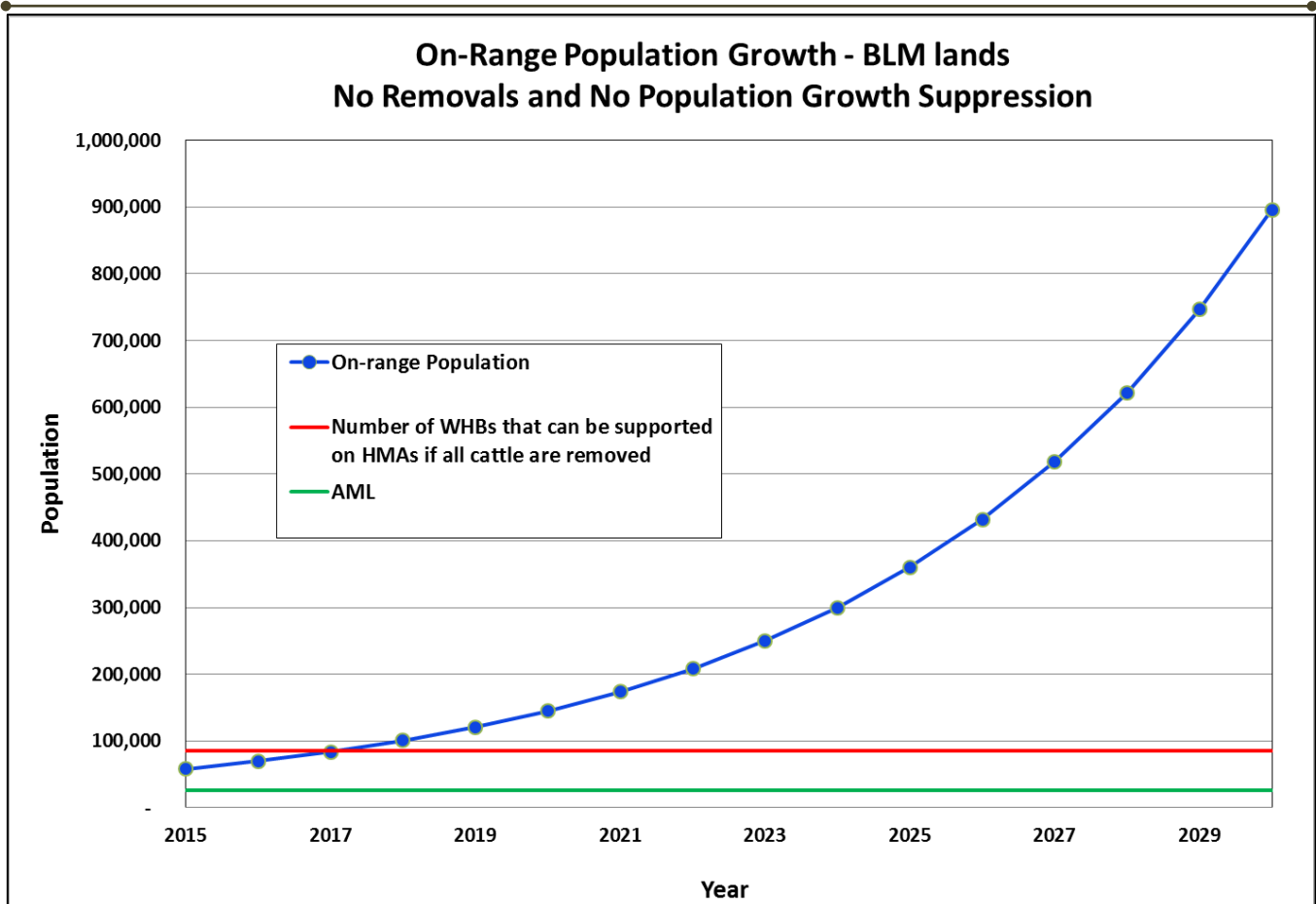


Figure adapted from a BLM Presentation on Wild Horse and Burros and updated with current numbers

Horse and burro populations are growing at an exponential rate, and already exceed Appropriate Management Levels (AML), represented by the green line, by approximately 31,000 animals.

Livestock, which are managed closely by the BLM, are one of the appropriate uses of our nation's rangelands. A regulated livestock animal does much less damage to the rangeland ecosystem than an unmanaged wild horse or burro.

The BLM has stated that rangelands could only support ~85,000 horses and burros even if all livestock were removed. ***This number, represented by the red line in the figure above, will be surpassed within three years if the BLM continues with the same management practices.*** High population numbers will degrade the health of the rangelands and come to a point of "self-limitation" – this will involve horses and burros starving to death and dying of dehydration due to a lack of resources to support the population. This situation is already occurring on some areas of the rangelands.