



August 30, 2013

Bureau of Land Management, National Wild Horse and Burro Program
WO-260, Attention: Ramona DeLorme
1340 Financial Boulevard
Reno, NV 89502-7147

Members of the Wildlife Horse and Burro Advisory Board:

The National Horse & Burro Rangeland Management Coalition (“Coalition”) is submitting this statement for the meeting record of the Bureau of Land Management (BLM) National Wild Horse and Burro Advisory Board, September 9, 10, and 11, 2013. Formed in 2012, the Coalition is a diverse partnership of 15 wildlife conservation and sportsmen organizations, industry partners, professional natural-resource scientific societies, and affiliates. We work together to identify proactive and comprehensive solutions to increase effective management of horse and burro populations and mitigate the adverse impacts these wild horses and burros have on healthy native fish, wildlife, and plants, and on the ecosystems on which they depend.

The Coalition generally supports the findings of the National Academies of Sciences report, “Using Science to Improve the BLM Wild Horse and Burro Program: A Way Forward”. The following key findings have been identified, along with the Coalition’s recommendations moving forward:

SUMMARY OF CURRENT SITUATION:

“The continuation of ‘business-as-usual’ practices will be expensive and unproductive for BLM. Because compelling evidence exists that there are more horses on public rangelands than reported at the national level and that horse population growth rates are high, unmanaged populations would probably double in about 4 years. If populations were not actively managed for even a short time, the abundance of horses on public rangelands would increase until animals became food-limited. Food-limited horse populations would affect forage and water resources for all other animals on shared rangelands and potentially conflict with the multiple-use policy of public rangelands and the legislative mandate to maintain a thriving natural ecological balance... The committee’s conclusions that there are considerably more horses and possibly burros on public lands than reported and that population growth rates are high suggest that the effects of fertility intervention, although potentially substantial, may not completely alleviate the challenges BLM faces in the future in effectively managing the nation’s free-ranging equid populations, given legislative and budgetary constraints.” (NAS Report)

KEY FINDINGS:

FINDING: The primary way that equid populations self-limit is through increased competition for forage at higher densities, which results in smaller quantities of forage available per animal, poorer body condition, and decreased natality and survival.

NAS found:

1. “Case studies show that animal responses to density dependence will include increased numbers of animals that are in poor body condition and are dying from starvation.”

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2. “Rangeland health is also affected by density dependence. Equids invariably affect vegetation abundance and composition. Reduced vegetation cover, shifts in species composition, and increased erosion rates often occur on rangelands occupied by equids.”

There is no basis in law or in sound policy to permit horse and burro populations to increase to the point that self limitation should occur through starvation. In fact, the law mandates the opposite and requires management to achieve healthy equid populations in a thriving natural ecological balance. Therefore, the Coalition recommends BLM not pursue a policy of self limitation and that it actively pursue other alternatives that are not only more humane for equids but for the health of the range itself and the native fish and wildlife that share the range. There are more humane ways to manage the population and ensure a thriving natural ecological balance.

FINDING: On the basis of the information provided to the committee, the statistics on the national population size cannot be considered scientifically rigorous.

NAS found:

1. “The links between the statistics on the national population size and actual population surveys, which are the foundational data of all estimates, are obscure. The procedures used for developing annual HMA population-size estimates from counts are not standardized and often not documented.”
2. “...but 50-60 percent were undetected in more rugged terrain with tree cover (Frei et al., 1979; Siniff et al., 1982). More recent studies of inventory techniques have reaffirmed those conclusions.”
3. “A large body of scientific literature focused on inventory techniques for horses and many other large mammals clearly refutes that assumption (perfect detection) and shows estimates of the proportion of animals missed on surveys ranging from 10 to 50 percent depending on terrain ruggedness and tree cover.”

Therefore, the Coalition supports NAS’ recommendation of “Development and use of a uniform and centralized relational database, which captures all inventory and removal data generated at the level of the field offices and animal processing and holding facilities, to generate annual program-wide statistics would provide a clear connection between the data collected and the reported statistics.”

Given the confirmation that the proportion of animals missed on current surveys ranges from 10 – 50 percent, the Coalition also supports BLM’s continued partnership with USGS to refine the protocols for population surveys. However we caution BLM to ensure the protocols used are field tested on equids in various western U.S. terrains to ensure their accuracy and encourage BLM to seek expertise in addition to that offered by the USGS.

Most importantly, the Coalition believes that establishing more methodologically sound means of determining equid populations should not impede or delay the urgent need of pursuing policy alternatives that will restore a more sound ecological balance on the range.

FINDING: Horse populations are growing at 15-20 percent a year.

NAS Found:

1. “On the basis of the published literature and the additional management data reviewed by the committee, the committee concluded that most free-ranging horse populations managed by BLM are probably growing at 15-20 percent a year.”

The Coalition recommends utilizing extensive fertility control as a tool to reduce the population growth rate. The Coalition also supports BLM’s efforts to identify a suite of population and fertility control methods. One kind of fertility control may not be appropriate for all herds within an HMA and a host of tools should be used to maximize effectiveness.

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FINDING: The most promising fertility-control methods for application to free-ranging horses or burros are porcine zona pellucida (PZP) vaccines, GonaCon™ vaccine, and chemical vasectomy.

NAS Found:

1. “The criteria most important in selecting promising fertility-control methods for free ranging equids are the delivery method, availability, efficacy, duration of effect, and potential physiological and behavioral side effects.”
2. “Considering those (above) criteria, the methods judged most promising are PZP and GonaCon vaccination of females and chemical vasectomy in males. Each method has advantages and disadvantages (Table S-1). Of the PZP vaccines, PZP-22 and SpayVac® seem most appropriate and practical because of their longer duration of effect.”

In the view of the Coalition, the NAS report highlights the urgency of BLM using the most effective and efficient fertility control methods as a tool to reduce WH growth rates. While NAS suggests PZP, GonaCon, and chemical vasectomies are the most promising fertility control methods, these three methods are far from ready to serve as BLM’s primary WH&B population management tool. BLM has applied PZP22 fairly widely in recent years and its effectiveness has been very limited in most cases. GonaCon™ and chemical vasectomy are virtually untested in BLM HMAs, and NAS states that chemical vasectomy is untested in wild equines.

The only current effective drug in the PZP family is the one year liquid. However, use of the PZP one year liquid will not satisfy even modest criteria that might be established for "delivery method" and "duration of effect" for use on most HMAs. While this method works in the small HMAs such as the Little Bookcliffs herd with AML of 90 – 150 horses, it is not practical to treat mares annually in the vast majority of HMAs where the herds are much larger and less familiar with human interaction. Finding and staffing limitations are also a limiting factor in administering the PZP one year liquid at the scale and frequency needed to achieve effective fertility reductions.

The Coalition recommends the use of ovariectomies in mares in HMAs and sterile herds. The Coalition supports gelding and the promotion of non-reproducing herds in select areas. We recommend that BLM pursue research and possible utilization of chemical vasectomy. BLM should continue to research and improve on fertility control techniques and should strive to use a diversity of fertility control options when necessary.

FINDING: How AMLs are established, monitored, and adjusted is not transparent to stakeholders, supported by scientific information, or amenable to adaptation with new information and environmental and social change.

NAS Found:

1. “AMLs are a focal point of controversy between BLM and the public.”
2. “Data and methods used to inform decisions must be scientifically defensible.”
3. “Resources are allocated to horses or burros in a context of contending uses for BLM lands, all of which have some standing in the agency’s charge for multiple-use management.”

The Coalition recommends that the immediate primary goal be to reach currently-established AMLs in an effort to protect the natural resources, the condition of the horses, and meet the congressional directive of respecting multiple uses of the resources.

Once the current AMLs are reached, BLM should work towards completing Herd Management Area Plans (HMAP) for each HMA. The HMAPs are typically designed to evaluate the AML and plan range improvements within the following ten years.

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The bigger concern is the flexibility BLM has throughout the ten year planned period. In the event of significant multiple drought years or conflicting conservation mandates such as endangered species management, BLM may need the flexibility to remove excess horses based on the condition of the resource.

The Coalition continues to stress that the BLM should manage rangeland resources for multiple-use in accordance with the law and the land's scientifically proven capability to accommodate a variety of uses, including the presence of horses and burros and other wildlife. The consistent application of sound science and economics in relation to animal and rangeland management should be used throughout the horse and burro program. The Coalition thanks the Board for their efforts to advise the BLM on ways to effectively interpret and apply the findings of the NAS report and for considering these remarks. We are pleased to offer our assistance and collective member expertise to the Advisory Board should additional information be requested.

Sincerely,



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