



## 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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March 6, 2014

The Honorable Mary Landrieu  
Chair  
Committee on Energy and Natural Resources  
U.S. Senate  
Washington, D.C. 20510

The Honorable Lisa Murkowski  
Ranking Member  
Committee on Energy and Natural Resources  
U.S. Senate  
Washington, D.C. 20510

The Honorable Doc Hastings  
Chairman  
Committee on Natural Resources  
U.S. House of Representatives  
Washington, D.C. 20515

The Honorable Peter DeFazio  
Ranking Member  
Committee on Natural Resources  
U.S. House of Representatives  
Washington, D.C. 20515

### **Re: Need for Congressional support of Wild Horse & Burro Program, Bureau of Land Management**

Dear Chairwoman Landrieu, Ranking Member Murkowski, Chairman Hastings and Ranking Member DeFazio:

In a recently released internal working document (attached) for the Bureau of Land Management's Wild Horse & Burro Program, Division Chief Joan Guilfoyle described the current state of the program as "nearing the point of financial insolvency." She specifically cited challenges resulting from a growing population of horse and burros on the range, increasing program costs, declining adoptions and holding pasture space, and declining appropriations. Although Ms. Guilfoyle may have intended this memorandum to be an internal, working document, it nonetheless points out some very troubling and accurate aspects of the program.

The National Horse & Burro Rangeland Management Coalition agrees with Ms. Guilfoyle's assessment of the program. However, we are deeply concerned with the prioritization of actions Ms. Guilfoyle has outlined in her memo, including the decision to halt the removal of horses and burros from rangelands.

Historically, financial and policy constraints, and the sometimes lack of science-based management of horse and burro populations, have led to herd overpopulation, resulting in negative impacts to the surrounding habitat, including native plant and wildlife species. Therefore, we do not support the decision to halt altogether the removal of horses and burros from the range. This decision not only violates the *Wild Free-Roaming Horses and Burros Act* requiring the removal of excess horses, but, also places millions of acres of rangelands at risk to further degradation. Horses and burros are non-native species that stress natural vegetation communities through overgrazing, competing with native wildlife for scarce resources, and causing soil compaction. All of these impacts adversely affect crucial habitat

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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

Contact us at [horseandrange@gmail.com](mailto:horseandrange@gmail.com) or visit us on the web at [wildhorserange.org](http://wildhorserange.org)



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areas, such as 9.9 million acres of Greater Sage Grouse habitat, a candidate for Endangered Species listing.

On the range, horse and burro populations increase by approximately 20% annually. Without removal by the BLM, these populations will not receive proper management and will continue to grow. Eventually, if it is not already occurring, each population will adversely affect the range and the horses themselves. Further, expanding populations encroach on property interests on public and private lands and expansion on to private and state properties outside available Herd Management Areas violate BLM's statutory authority. The existing fertility control methods have proven to be ineffective at restraining the population under existing management protocols.

Based on the many issues surrounding the BLM's Horse & Burro Program, we call upon the Committees to engage in and support necessary actions to ensure the goals of the program are sustained. A sustainable program must:

- **Fulfill BLM's mission** "to sustain the health, diversity, and productivity of America's public lands for the use and enjoyment of present and future generations"<sup>i</sup>; and
- **Comply with the Wild Horse and Burro Act:**  
"The Secretary is authorized and directed to protect and manage wild free-roaming horses and burros as components of the public lands... 'The Secretary shall manage wild free-roaming horses and burros in a manner that is designed to achieve and maintain a thriving natural ecological balance on the public lands.'" 16 U.S.C. § 1333(a)

We believe the BLM can address the welfare concerns of horses and burros while ensuring our nation's rangelands are healthy and capable of supporting native wildlife populations and ecosystems. The Coalition would appreciate the opportunity to meet with you and your staff to discuss possible long-term solutions to this contentious issue. For further information regarding the Coalition, please contact [ted-ramsey@nacdnet.org](mailto:ted-ramsey@nacdnet.org).

Sincerely,

American Farm Bureau Federation  
Association of Fish and Wildlife Agencies  
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

***Attachments: Internal Memo from Chief Joan Guilfoyle, Coalition Policy Statement***

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<sup>i</sup> U.S. Department of Interior. *Bureau of Land Management: Who We Are, What We Do*.  
[http://www.blm.gov/wo/st/en/info/About\\_BLM.print.html](http://www.blm.gov/wo/st/en/info/About_BLM.print.html)

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*Internal Working Document*

**INFORMATION MEMORANDUM FOR THE ASSISTANT DIRECTOR,  
RENEWABLE RESOURCES AND PLANNING– August, 2013**

FROM: Joan Guilfoyle, Wild Horse and Burro Division Chief, (202) 912-7260

CC: Greg Shoop, Department Assistant Director, Renewable Resources & Planning

SUBJECT: State of the Wild Horse and Burro Program and Strategic Direction for FY14 and Beyond

**I. INTRODUCTION**

The wild horse and burro program is nearing the point of financial insolvency due to undesirable trends in every aspect of the program. These trends are preventing the achievement of program goals and involve increasing costs. Most problematic as illustrated in Attachment 1 are: declining appropriations, increasing costs for every program element; increasing on-range populations, increasing off-range numbers, declining adoptions, and decreasing long-term holding pasture space. Continued decreases in appropriations, as much as 5% annually, are expected to occur. Drastic changes in course are mandatory to remain financially solvent and reverse trends that compromise the achievement of on-range management goals. Considering these circumstances, on-range management goals may not be achieved for another 20 years.

**II. PROGRAM STATUS AND STRATEGIC MANAGEMENT CHANGES**

**A. Program Status – FY2014**

A funding target of \$69.6 million substantially reduces operational work, what can and can't be done is listed below.

*What We Can Do*

- Feed/care for captive animals
- Herd health monitoring
- Vegetation monitoring
- Modified adoption program: de-emphasize satellite adoptions and emphasize facility, internet and trained animals through partnerships
- Plan and design population surveys (new USGS methods) – no flights
- Attempt to expand ground darting programs
- Continue existing research studies: Spayvac, 3 yr. PZP and sterilization (initiated in FY 2013)
- Reduced level of adoption compliance – required random and response to complaints

*What We Can't Do*

- Remove animals
- CTR gathers
- Population growth suppression except for ground darting
- Population survey flights
- New research
- Implement NAS recommendations except for responsive policy development.
- Reduce or curb on-range population growth; February 2014 population expected to be 48,000 and growing to 58,000 by February 2015

### *Internal Working Document*

#### B. Recommendations for Strategic Management Changes

Assuming a funding level of \$69.6 M in FY 2014 and continued reductions of as much as five percent per year thereafter, the following changes in program direction need to be considered. These stop-gap actions are needed until longer acting and more effective contraceptives can be developed and holding costs can be reduced to free-up significant amounts of funding to implement critical on-range management actions.

##### Recommendations:

1. *Cease removals immediately* beginning with FY 2013 summer removals that aim to remove 1,300 WHBs.
  - *Rationale:* The 1,300 removals in FY 2013 and potential 1,000 more in FY 2014 were based on the assumption that the current 35,000 LTH space would continue to be available. This assumption is no longer valid. Communications with LTH contractors indicate new contracts that will replace expiring contracts will reduce space by 1,400 to 2,300. These animals will have to be absorbed into STH facilities at higher costs. Costs for holding must be reduced to free up funding for on-range management.
2. *Reduce off-range numbers and associated costs to a specified "cap" number.* Two options for expressing the cap exist: "maximum number of animals" or "maximum annual holding cost". No removals would be conducted until reductions down to the cap level are achieved and then only to the extent that the cap is not exceeded. During the time when no removals occur, nuisance animals causing public safety issues would be re-located to a new on-range area.
  - *Rationale:* This action is aimed at reducing holding costs to ensure financial solvency in light of declining appropriations and to free up funding for on-range management.
  - *Consequence:* The on-range population number would grow to 48,000 by February 2014; 58,000 by February 2015 and 69,000 by 2015 without removals or contraceptive treatments. The degree contraception/sterilization can occur depends on future budget sequestration reductions and the reduction in holding costs.
3. *Euthanize on-range animals* as an act of mercy if animals decline to near-death condition as a result of declining water and forage resources.
  - *Rationale:* Funding and space prohibit the removal of any animals in the near future. Euthanasia of near-death animals is the only responsible alternative.
4. *Research:* Immediately conduct pen trials to develop protocols for spaying and chemical vasectomy and continue existing on-going research to develop longer acting PZP vaccines. As funding is available, eventually initiate research responsive to NAS recommendations involving population surveys, human dimensions, and additional population growth suppression methods.

### *Internal Working Document*

5. *Initiate an aggressive adoption/sales program to reduce holding numbers as quickly as possible to attain the holding cap.* Request additional funding to support the initiative. Aim to place in good homes.
6. *Initiate an interim on-range sterilization program combined with PZP application.* This is only possible if off-range holding costs are reduced or if new funding is appropriated for this purpose. Most treatments would need to occur through helicopter gathers, however expanded ground darting programs may be possible in some new HMAs with substantial "Friends Group" involvement or through an "Adopt a Herd" program.
  - *Rationale:* This is the only way to dramatically curb on-range population growth without removals and the development of a longer duration contraceptive vaccine or other effective population growth suppression methods.

#### For Further Discussion:

1. *Continue to haul water* to maintain animals where forage is adequate and hauling is feasible.
  - a. *Rationale:* Some situations like the animals outside of the Snowstorm HMA will experience immediate large scale die-offs without water hauling. Water hauling where it is feasible, is the sensible thing to do to avoid preventable large scale mortality and a public spectacle.

### III. POSITION of INTERESTED PARTIES

There is heightened and increasing interest in WH&B management changes among conservationists, public land grazers, wild horse and burro activists and Congress.



# NATIONAL HORSE & BURRO RANGELAND MANAGEMENT COALITION

## **POLICY STATEMENT**

## **Managing America's Horses and Burros**

America's wild and free-roaming horses (*Equus caballus*) and burros (*E. asinus*) are the descendants of domesticated Eurasian and African horses and burros and are an iconic, yet non-native, species in North America. The 1971 Federal Wild Free-Roaming Horses and Burros Act (the Act) authorizes the BLM and USFS to oversee the management, protection, and control of these animals on limited designated areas on public lands. Horses and burros are found on a variety of public lands, including those managed by BLM, USFS, NPS, NWRS, and DOD.



Skinny Mare, Nevada, 2012  
(Credit: Savannah Strum)

### **Land Management Agencies**

*The following federal agencies are responsible for balancing horses and burros with natural resource management, biodiversity, and other multiple uses on public lands.*

Bureau of Land Management (BLM)

Department of Defense (DOD)

National Park Service (NPS)

U.S. Fish & Wildlife Service's National Wildlife Refuge System (NWRS)

U.S. Forest Service (USFS)

As of February 2012, BLM estimated that the population of horses and burros on BLM-managed rangelands is 37,000 throughout ten western states. This number greatly exceeds appropriate management levels (AML) of 26,500, which is the population size that BLM can graze without causing ecological damage to rangeland resources.

In addition to those populations existing on rangelands, more than 47,000 horses and burros are being held in corrals and pastures at taxpayer expense -- removed by BLM in an effort to maintain AMLs. Only 2,844 were placed into adoption in 2011, and only 5,700 have been sold since 2005.

### **Healthy Native Rangelands**

The rangeland resources must be managed to maintain and conserve rangeland biodiversity. The overpopulation of horses and

burros on public lands poses a severe threat to rangeland resources and to the native fish, wildlife, and plants that characterize a healthy rangeland ecosystem.

### **Managing Healthy Horses**

Management is beneficial to the health of these animals. Horses and burros are vulnerable to starvation and dehydration resulting from overpopulation and the subsequent degradation of overall rangeland health; the health and well-being of these and all other animals utilizing rangelands are put in jeopardy when population numbers exceed AMLs.

### **Managing for Multiple Use**

The rangeland resource should be managed 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 the biodiversity of the landscape. Although the management of horses and burros was statutorily mandated in the Act as a multiple use where these animals were found in 1971, the law does not grant use priority over native wildlife, grazing, recreation, and other approved uses.

### **Fertility Control & Removal**

Horses and burros have no natural predators and under the Act their populations cannot be managed by traditional wildlife management practices. Horses and burros typically double their herd size every four to five years if not actively managed. Effective removal and fertility control programs must be implemented to conserve and protect rangeland resources and to manage population growth such that reproduction rates match sale and adoption rates. Additionally, appropriate exclusionary methods should be used on NPS and NWRS lands to

protect native species that are adversely impacted by these animals.

### **Sound Science**

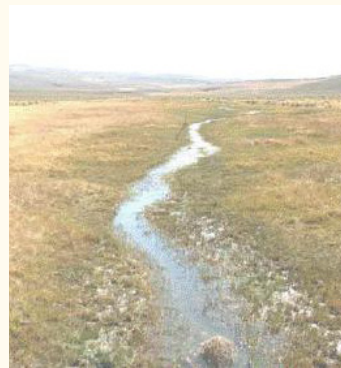
Responsible agencies should adhere to a high standard of scientific integrity through the use of sound scientific principles to develop management plans, review practices, and accurately and precisely identify the impacts (via monitoring) of horses and burros on wildlife populations, habitats, and other natural resources managed for public benefit.

### **Fiscal Responsibility**

During economically difficult times, it is imperative that funding for the Federal Wild Horse and Burro Program be wisely used to manage and improve the rangelands on which these animals roam and where they increasingly can have an adverse impact. While programmatic costs to the taxpayer have increased from \$36.7 million in 2004 to \$75 million in 2012, the percentage of the budget used for on-the-ground



Pronghorn at Horse Canyon Spring on the Sheldon National Wildlife Refuge, August 2009. The refuge has no livestock grazing. (Credit: Jeremy Drew, Nevada Board of Wildlife Commissioners)



Catnip Meadow in Sheldon NWR looking south. Before horse gather: September 9th, 2004. After horse gather: September 2nd 2006. (Credit: USFWS)



management and remediation has decreased by 13 percent.

### **Conclusion**

The burgeoning population of horses and burros on public lands threatens natural rangeland ecosystems, native fish,

wildlife, and plants, livestock grazing, horse and burro well-being, and taxpayer funds. The consistent application of sound science and economics in relation to animal and rangeland management should be used throughout all horse and burro programs.

## **About the Coalition**

The National Horse & Burro Rangeland Management Coalition is a diverse partnership of 13 wildlife conservation and sportsmen organizations, industry partners, and professional natural-resource scientific societies working together to identify proactive and comprehensive solutions to increase effective management of horse and burro populations and mitigate the adverse impacts to healthy native fish, wildlife, and plants and the ecosystems on which they depend.

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