



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

March 7, 2013

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

To the Wild 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. Formed in 2012, the Coalition is a diverse partnership of 13 wildlife conservation and sportsmen organizations, industry partners, and professional natural-resource scientific societies. 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.

While often recognized as components of the American West, horses and burros are in fact non-native species that are potentially destructive, damaging rangelands and threatening native plant and animal species, as well as jeopardizing other multiple uses, by trampling vegetation, hardpacking the soil, over-grazing, and competing for sometimes scarce water. The Coalition appreciates the Board’s efforts to find ways to reduce reproduction rates, increase adoptions and otherwise find solutions to a problem that continues to burden the BLM, taxpayers, and ranchers and create concerns for the welfare of free roaming horses and burros and the health of wildlife and the habitats on which they depend.

With regard to the agenda items listed in the Federal Register notice, we submit the following:

Comprehensive Animal Welfare Program (CAWP)

The Coalition applauds the BLM’s efforts to develop and implement a Comprehensive Animal Welfare Program to ensure the well-being of horses and burros during gathers and while in holding facilities. Additionally, horse and burro health and well-being on the range are a high priority. Due to high reproductive rates, long lifespan, federal protection, and a lack of natural predators, horse and burro herds can double in size every four to five years. Such a burgeoning population can adversely affect horse and burro well-being, and that of other wildlife, as animals compete for limited resources such as food and water. More than 37,000 wild horses currently reside on the range, over 11,000 more than the west-wide Appropriate Management Level (AML) of 26,500 individuals. These AMLs were scientifically determined and set to ensure healthy rangelands that can support wildlife, permitted livestock, and wild horses and burros. Only by managing horse and burro numbers at AMLs in all Herd Management Areas (HMAs) will the BLM successfully achieve and maintain “a thriving natural ecological balance on the public lands,” that will contribute to welfare of the horses and burros (required under the Wild Free-Roaming Horses and Burros Act) and other wildlife. For the sake of animal welfare and multiple-use, the

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Coalition supports actions that will bring HMAs into compliance with AMLs and emphasizes the following positions:

- Management decisions should be science-based and increase the ability of rangelands to support healthy horse and burro herds along with other multiple uses, including sustaining native plant and wildlife communities and livestock grazing.
- Horses and burros should be cared for in a humane manner; integral to this is managing herd populations at scientifically determined AMLs and removing old and injured animals.
- For the well-being of the horses and the resources, we prefer the strategy of complete removal for HMAs that are currently difficult and/or expensive to manage and/or where limited resources such as water present a persistent concern.
- We support the Board's recommendation that eco-sanctuaries should not be considered on public HMA lands where horses currently exist, as this may cause further stress to range conditions and adversely affect horse health and native fish and wildlife.
- We recommend that the Board revisit the discussion to place a high priority on attaining established AMLs within HMAs containing critical Greater Sage-grouse habitat. Tremendous federal, state, and private effort has gone toward averting listing of sage-grouse under the Endangered Species Act, avoiding the regulatory restrictions and fiscal commitment that accompanies such a listing. If the Greater Sage-grouse is listed, further restrictions or adjustments to current AMLs may result.

Population Growth Suppression

Horses and burros have no natural predators and their populations are not 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. Specifically:

- We support the increased use of fertility control where feasible, scientifically proven, and fully authorized by Federal and state law. In particular, we have concerns about the efficacy of the PZP-22 vaccine. The Coalition encourages BLM to continue to fund/support research for more efficacious alternatives, such as the US Geological Survey studies at North Lander Complex in Wyoming and Paul's Valley Adoption Facility in Oklahoma to evaluate the effectiveness of SpayVac®. Other federal land management agencies currently focused on population growth suppression, such as the US Fish & Wildlife Service and National Park Service, should be brought into the research discussion for greater transfer of science across jurisdictional boundaries. Additionally, we are encouraged by the Environmental Protection Agency's recent approval of the immunocontraceptive vaccine, GonaCon®. Such efforts are crucial to bringing horse and burro populations under control.
- We support the Board's recommendation to add ovariectomy as an additional fertility control option to be used in conjunction with other methods.

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- Division of herds by sexes and adjusting sex ratios holds promise and should be evaluated further as another tool to reduce the overall reproductive rate of herds. We also support the use of male-only herds as a means to reduce reproduction rates. These herds should consist of sterile animals to preclude the possibility of impacting horses on adjacent private lands and minimize negative effects on local areas. Non-reproducing herds should be placed on HMAs on which gathering excess horses and burros tend to be more difficult and/or expensive.

Increasing Adoptions

- Offering trained animals for adoption is important to increase demand for excess horses and burros. We encourage cost-effective initiatives to partner with entities such as universities, prisons and the Mustang Heritage Foundation.
- Adoptions and sales are far surpassed by supply. BLM policy should include a measure to relax adoption criteria to provide for full title transfer to place more animals in private care. One way to make the process more efficient is to allow those entities that have adopted or purchased wild horses and burros in the past to adopt or buy additional animals with no additional paperwork. All actions to increase efficient adoption and sale should be considered.

Herd Area Repopulation

Any placement of horses and burros on HMAs or HAs that currently have no horses and burros must include a scientific review of the resources to ensure the appropriateness of placing these animals on the landscape. We are opposed to the placement of horses and burros on HMAs or HAs that would negatively impact other multiple-uses or native fish and wildlife.

Eco-sanctuaries and Ecotourism

- We do not oppose cooperative agreements between BLM and private entities to establish preserves on private land only. These preserves, managed within current statutory authority, should contain non-reproducing herds. This can create opportunities for ecotourism while preventing the creation of yet another growing herd and the accompanying costs. However, it should be noted that this will still not solve the overarching problem of overpopulation across the rangeland west, which can only be addressed by reducing the number of individuals and reproduction rates both on and off the range.
- We oppose expanding HMAs or artificially increasing AMLs. Expanding HMAs or artificially increasing AMLs would violate current statute and be detrimental to multiple-use management of public lands.
- As previously mentioned, the Coalition supports the Board's recommendation that eco-sanctuaries should not be considered on public lands where horses currently exist and echo the Board's concerns about the difficulty in understanding the benefit(s) of establishing a public/private eco-sanctuary when the animal population of the area (HMA and the eco-sanctuary) is not allowed to exceed the AML. Establishing eco-sanctuaries should be to provide habitat for animals which have been removed from an area to protect rangeland health.

- Before an eco-sanctuary is established, the government should conduct a scientific review to evaluate the potential negative impacts to native species, including species of concern such as the Greater Sage-grouse and Lesser Prairie-Chicken. Additionally, the impacts of long- and short-term holding facilities should be evaluated for negative effects on species of concern, such as the Lesser Prairie Chicken in Oklahoma and Kansas.

Conclusion

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 successfully comply with a multiple-use mandate and for considering these remarks. We have included our formal policy statement for inclusion in the record and offer our assistance and collective member expertise to the Advisory Board should additional information be requested.

Sincerely,



Terra Rentz, Associate Wildlife Biologist®
Chair, National Horse & Burro Rangeland Management Coalition