



# 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*

## Transition: Wild Horse & Burro Management

Sustain healthy **Bureau of Land Management** and **US Forest Service** rangelands that support a balance of multiple uses, including wild horses, wildlife, ecosystem services, and livestock

### THE MANAGEMENT CHALLENGE – LIMITED OPTIONS TO ADDRESS GROWING OVERPOPULATION

- Wild horse and burro populations **already exceed ecologically-based management objectives**
- Populations of wild horses and burros continue to grow at exponential rates, **doubling every 4-5 years**
- Costs of off-range holding (>**\$1 billion over next 20 years**) limit funds available for on-range management
- Conflicting congressional appropriation riders and agency directives **severely limit agencies' ability to manage excess animals** and therefore comply with the Wild Free-roaming Horses and Burros Act of 1971

### SOLUTIONS – PRIORITIZE IMPROVED MANAGEMENT ACTIONS DURING TRUMP ADMINISTRATION

- Need to consider *all* management options available to **BLM** and **USFS**, including but not limited to:

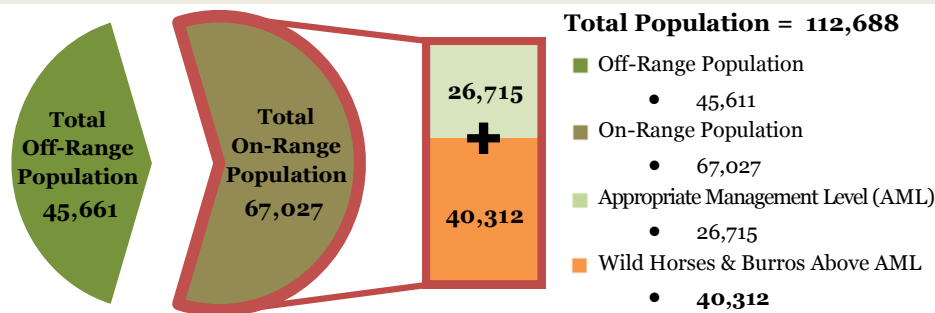
#### On-range: Reduce populations & slow growth

- **Increase removal of horses and burros**
- **Increase use of fertility control**
- **Apply sterilization techniques**

#### Off-range: Relieve BLM of budget obligations

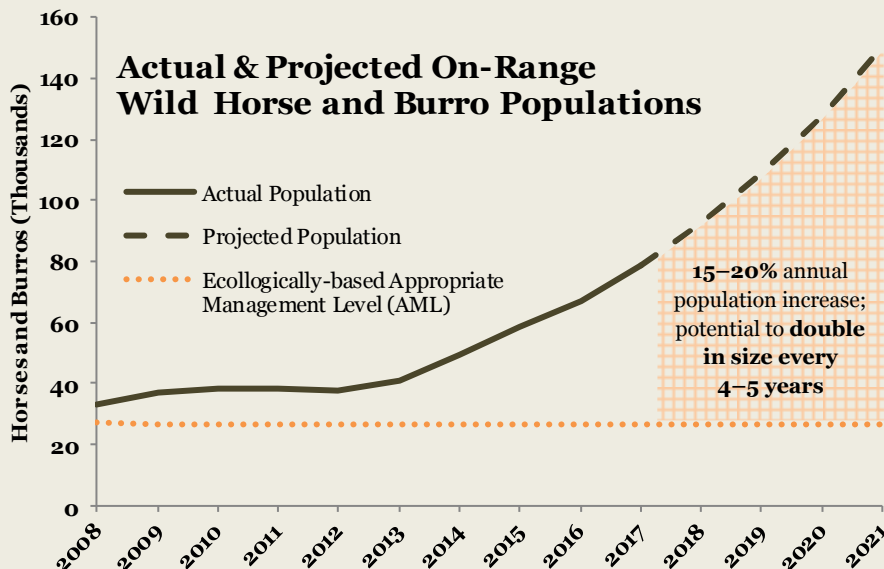
- **Increase adoptions via incentives**
- **Authorize & direct euthanasia**
- **Authorize & direct unrestricted sale**

### 2016 Wild Horse and Burro Population Status

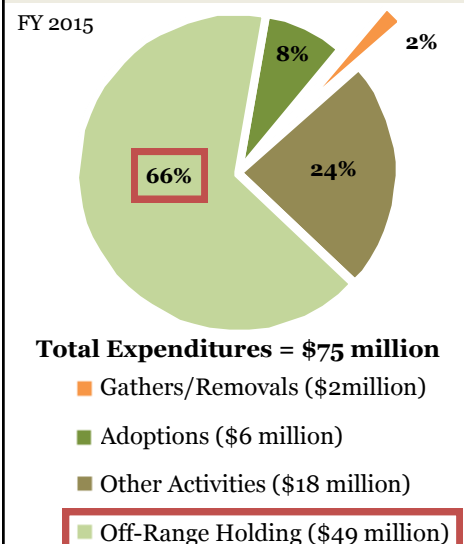


### Impacts of Excess Horses and Burros

Horse and burro health – *starvation and dehydration on the range*  
 Native wildlife – *competition for resources and habitat degradation*  
 Rangeland ecosystem – *soil compaction, desertification, invasive species*  
 Western heritage – *reduced grazing & recreation; local economies at risk*  
 Taxpayer dollars – *\$50 million/year spent on horses and burros in holding*



### Wild Horse and Burro Program Budget





## NATIONAL HORSE & BURRO RANGELAND MANAGEMENT COALITION

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to promote healthy wildlife and rangelands for future generations*

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DATE: 9 January 2017  
TO: President-elect Trump  
FROM: National Horse & Burro Rangeland Management Coalition  
RE: **Wild Horse & Burro Management in the new Administration – actions needed to protect health of public rangelands, wild horses and burros, native wildlife resources, and federal tax dollars**

Dear President-elect Trump:

Overpopulation of Congressionally designated “wild” horses and burros threaten the long-term health of our rangelands while negatively impacting multiple-use of our public lands across 10 western states. In order to ensure healthy rangelands for future generations, the incoming Trump Administration and Congress must work together to direct timely and meaningful changes to how our nation manages wild horses and burros.

The previous administration spent over half a billion dollars on wild horse and burro management over the past eight years but failed to achieve sustainable results. Wild horse and burro populations on Bureau of Land Management lands grew from 28,563 animals at the start of 2008 to over 67,027 animals today—more than doubling the population and far exceeding ecologically-sustainable levels. Frustrated by this inadequate management and the resulting rangeland damage, a diverse group of concerned organizations formed the National Horse and Burro Rangeland Management Coalition to support a common goal: rangeland health.

The National Horse & Burro Rangeland Management Coalition includes more than 18 national organizations, encompassing a wide range of sportsmen, livestock grower, state and local government, wildlife, and land conservation organizations and professional societies. Collectively, we represent over 10 million Americans and 6,000 local governments, and focus on commonsense, ecologically-sound approaches to managing horses and burros to promote healthy wildlife and rangelands for future generations. Healthy rangelands allow native wildlife to thrive, livestock to graze to support local communities, free-ranging horses and burros to live healthy lives, and water quality to be sustained. Healthy rangelands are essential to the Western way of life.

As you prepare to begin your service as our nation’s leader, the Coalition offers our assistance and support in improving wild horse and burro management. The included document outlines the urgency and severity of the problem, while providing the Coalition’s recommendations for achieving ecologically-sustainable wild horse and burro populations within a timeframe that will ensure healthy rangelands for future generations. Thank you for considering the input of our coalition. We look forward to working with you.

Sincerely,

Keith Norris, Associate Wildlife Biologist@  
Coalition Co-Chair, Dir. of Gov. Affairs & Partnerships  
The Wildlife Society  
keith.norris@wildlife.org  
cc: Doug Domenech, Rep. Ryan Zinke, Congressional Committees

Chris Heck  
Coalition Co-Chair, Government Affairs Associate  
National Assoc. of Conservation Districts  
chris-heck@nacdn.net

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American Farm Bureau Federation • American Sheep Industry Association • Congressional Sportsmen’s Foundation  
Masters of Foxhounds Association • Mule Deer Foundation • National Association of Conservation Districts  
National Association of Counties • National Association of State Departments of Agriculture  
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 • Wild Sheep Foundation



# NATIONAL HORSE & BURRO RANGELAND MANAGEMENT COALITION

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## WILD HORSE AND BURRO TRANSITION SUMMARY

### MANAGEMENT OBJECTIVE

Sustain healthy rangelands that support a balance of multiple uses, including wild horses, wildlife, ecosystem services, and livestock

### MANAGEMENT CHALLENGE – LIMITED OPTIONS TO ADDRESS GROWING OVERPOPULATION

- Wild horse and burro populations already exceed ecologically-based management objectives
- Populations of wild horses and burros continue to grow at exponential rates, doubling every 4-5 years
- Costs of off-range holding (\$50 million/year) limit funds available for on-range management
- Congressional appropriation riders and agency directives conflict with federal law and severely limit agencies' ability to manage excess animals

### HISTORICAL AND LEGAL CONTEXT

- Horses and burros are non-native, invasive species in North America
- The Wild Free-Roaming Horses and Burros Act designates some populations of horses and burros as “living symbols of the historic and pioneer spirit of the West;” to be managed as “components of public lands;” in a manner “designed to achieve and maintain a thriving natural ecological balance”
- Under this Act, agencies must remove excess animals in overpopulated areas, and offer those animals for adoption, followed by the destruction or sale of animals for which an adoption demand does not exist (latter two options prohibited by an appropriations rider, leading to costly off-range storage)

### WILD HORSE AND BURRO POPULATION STATUS AND TRENDS

- BLM's ecologically-based Appropriate Management Level (AML) is currently set at 26,715 animals
- >67,000 horses and burros reside on BLM rangelands—greater than two-and-a-half times AML
- ~45,000 additional excess horses and burros living in long- and short-term holding facilities
- 15–20% annual population increase; potential to double in size every 4–5 years

### CONTINUED AND GROWING IMPACTS OF EXCESS WILD HORSES AND BURROS

- Horse and burro health – *starvation and dehydration are a likely result of overpopulation*
- Native wildlife – *competition for water and food resources and habitat degradation*
- Rangeland ecosystem – *soil compaction, spread of invasive species, desertification*
- Western heritage – *reduced grazing, impact to recreational activities; local economies at risk*
- Taxpayer dollars – *\$50 million spent on horses and burros in holding; costs continue to rise*

### SOLUTIONS – PRIORITIZE IMPROVED MANAGEMENT ACTIONS DURING TRUMP ADMINISTRATION

- Achieving population objectives that balance wild horse and burro populations with the needs of rangeland health will require the application of multiple management activities
- Need to consider *all* management options available to BLM and USFS, including but not limited to:

#### ***On-range:*** manage to AML & reduce growth rate

- Increase removal of excess horses/burros
- Increase use of effective fertility control
- Apply sterilization techniques

#### ***Off-range:*** relieve BLM of budget obligations

- Increase adoptions via incentives
- Implement euthanasia & unrestricted sale, as directed by the 1971 Act

### CONCLUSIONS AND RECOMMENDATIONS

The Coalition recommends actions that enable BLM and USFS to gather and remove sufficient numbers of horses and burros to achieve ecologically-sustainable population levels, support multiple uses of the range, and ensure rangeland health.

## HISTORICAL & LEGAL CONTEXT

In 1971, Congress passed the **Wild Free-Roaming Horses and Burros Act (1971 Act)**, which declares certain populations of feral horses and burros in the U.S. as “living symbols of the historic and pioneer spirit of the West;” to be managed as “components of public lands;” in a manner “designed to achieve and maintain a thriving natural ecological balance.” To achieve this multiple-use focus, the 1971 Act directs the **Bureau of Land Management (BLM)** and **U.S. Forest Service (USFS)**, through the Secretaries of Interior and Agriculture, to determine an **Appropriate Management Level (AML)**, representing the number of wild horses and burros that can exist without causing damage to the an area of land. In areas found to be overpopulated, the 1971 Act further directs the agencies to achieve AML by removal of excess animals for adoption, followed by the destruction or sale of excess animals for which an adoption demand does not exist.

Feral horses and burros are an invasive species in North America. As an invasive species, feral horses and burros cause direct and/or indirect economic and environmental harm within the ecosystems into which they have been introduced. The 1971 Act protects a small portion of these horses and burros as culturally and historically significant, but this does not authorize agencies to ignore the economic and environmental harm they cause; especially when improperly managed. It is important to note that this document focuses solely on the management of congressionally designated “wild” horses and burros on BLM lands and does not address the smaller population of “wild” horses and burros on USFS lands or the hundreds of thousands of additional feral horses and burros that roam freely on other federal, state, tribal, and private lands.

# NATIONAL HORSE AND BURRO RANGELAND MANAGEMENT COALITION

## 2017-2020

## TRANSITION DOCUMENT FOR PRESIDENT-ELECT TRUMP

### WILD HORSE AND BURRO POPULATION STATUS AND TRENDS

BLM currently sets range-wide AML at 26,715 animals. As of March 2016, wild horses and burros on BLM-administered lands **exceed 67,000 individuals**; more than two-and-a-half times the agency’s ecologically-based management objective. Under the current management approach, **on-range populations of horses and burros grow 15-20% annually**, or at a rate that will see populations **double in size every 4 to 5 years**. Without immediate action to address this overpopulation, wild horse and burro populations will **likely exceed 130,000 animals by 2021**—nearly five times the AML.

In addition to on-range overpopulation, BLM currently **pays to house an additional 45,611 excess wild horses and burros** in off-range, long- and short-term holding facilities. This makes the current total number of excess (exceeding AML) wild horses and burros for which the BLM is responsible, both on- and off-range, greater than **85,896 animals**.

As of Fiscal Year 2016, the federal government spends approximately \$81 million per year on the Wild Horse and Burro Program. Of this amount, nearly **\$50 million** per year funds off-range holding facilities, which currently house over **45,000 excess horses and burros**. Without immediate action to reduce the number of excess horses in off-range holding facilities, the costs for caring for these excess animals will exceed **\$1 billion dollars over the next 20 years**. Moreover, these high off-range costs limit funds available for on-range management—less than **\$2 million** per year goes towards gathers and removals.



## THE MANAGEMENT CHALLENGE – LIMITED OPTIONS TO ADDRESS GROWING OVERPOPULATION

Wild horses and burros on BLM-administered lands already greatly **exceed ecologically-based management objectives**, on-range populations continue to **grow at exponential rates**, and off-range holding facilities are nearly full—the capacity of which can only increase at great financial cost. Under the 1971 Act, BLM is **required to “preserve and maintain a thriving natural ecological balance”** between wild horse and burro populations, wildlife, livestock, and vegetation through “*removal or destruction of excess animals or through other options.*”

However, a variety of conflicting Congressional appropriation riders and agency directives restricting the use of euthanasia and unrestricted sale have severely limited BLM’s ability to manage excess animals and comply with the 1971 Act. As a result of these restrictions, BLM has relied heavily on the costly practice of removing excess horses and burros from the range and housing them in off-range holding facilities, **where over 45,000 animals now reside at the cost of nearly \$50 million per year**. Without additional management actions, off-range holding costs will *likely exceed \$1 billion* over the next 20 years for those animals already gathered. Currently, over **74 percent** of the BLM Wild Horse and Burro Program funding goes to off-range holding costs and adoptions.

With **limited funds available for on-range management** and diminishing capacity to hold gathered horses, the agency has been unable to gather and remove animals from the range at a rate substantial enough to reduce or maintain population levels. In Fiscal Year 2015, BLM sold 267 horses and burros and adopted out 2,631 animals—a decline of nearly 80% since peak adoption rates in the 1980s. Present adoption rates would need to quadruple to even come close to providing the capacity necessary to counter the growth of the current on-range population.

### CONTINUED AND GROWING IMPACTS OF EXCESS WILD HORSES AND BURROS

#### ***Horse and burro health – starvation and dehydration are a likely result of overpopulation***

Declining critical water resources and environmental conditions threaten the health and well-being of wild horses and burros. The BLM has limited ability to address this issue via emergency gathers.

#### ***Native wildlife – competition for water and food resources and habitat degradation***

Sage-grouse habitats overlap with more than 30% of BLM horse and burro management areas. Horses and burros overgrazing forage, trampling vegetation, spreading invasive species, and causing soil compaction, all weaken efforts to keep this bird off of the Endangered Species list, and harm other wildlife.

#### ***Rangeland ecosystem – soil compaction, spread of invasive species, desertification***

Areas inhabited by horses and burros tend to have fewer plant species, less vegetative cover, and an increased susceptibility to invasive plant species, which can have ecosystem-wide implications.

#### ***Western heritage – reduced grazing, impact to recreational activities, local economies***

Western rangelands are utilized by ranchers, farmers, hunters, campers, and other recreationists. The detrimental ecological impacts of horse and burro overpopulation have resulted in a depletion of resources for livestock as well as for native wildlife that draw outdoor enthusiasts to the area.

#### ***Taxpayer dollars – \$50 million spent on horses and burros in holding; costs continue to rise***

This program’s budget continues to be consumed by the off-range holding facilities, causing BLM to remove fewer and fewer horses and burros from the rangelands. The horses and burros removed from rangelands and placed in holding facilities currently cost taxpayers about \$50 million annually. The cost can reach \$50,000 per animal that remains in these facilities for its entire life.



## SOLUTIONS

Effective management of wild horses and burros will require implementation of rigorous on- and off-range management practices:

**To solve the off-range management challenges**, which will allow resources to be directed to on-range management, our Coalition recommends your administration *work with Congress* to:

1. ***Authorize euthanasia and unrestricted sale*** – Current restrictions placed on BLM limit their ability to sustainably and cost-effectively manage wild horses and burros. Authorizing unrestricted sale and euthanasia—as permitted by the 1971 Act—will enable BLM to relieve themselves of the high costs of caring for these animals indefinitely. This recommendation was also made by the National Wild Horse & Burro Advisory Board (Advisory Board), a Federal Advisory Committee, directed and authorized by the Administration to provide insightful recommendations on behalf of the public. The Advisory Board made their recommendation after a careful review of the dire situation facing our public rangelands and wild horse and burro herds and in recognition that the current and available management options are not capable of protecting the health of our rangelands, native wildlife, and horse and burro herds. Because it reflects the original Congressional intent and will help resolve the current wild horse and burro overpopulation crisis, our Coalition supports the Advisory Board’s recommendation to:
  - a. ***Work with Congress to remove language in the annual Interior, Environment, and Related Agencies Appropriations bill which restricts the BLM’s ability to sell and/or euthanize horses; and***
  - b. ***Direct agencies to euthanize excess animals for which an adoption demand does not exist pursuant to the 1971 Act and/or sell animals that either 1) are over 10 years of age or 2) have been passed up for adoption 3 times, under a 2004 amendment to the Act.***
2. ***Increase adoptions/transfers via incentives and authorities*** – The Coalition supports Congressional language to more efficiently facilitate the transfer of animals to other public entities (local, State, and Federal agencies) who have a need for domestic work animals and/or other incentives that could produce additional adoptions.

**To solve the on-range management challenges**, which will protect rangeland ecosystems, our Coalition recommends your administration *provide and direct resources to*:

3. ***Increase gathers and removals to meet AML*** – BLM employees and contractors gather horses and burros from the rangelands via a variety of methods that follow established humane protocols and procedures. This is the primary method of reducing populations of on-range horses and burros to meet AML.
4. ***Increase use of effective fertility control vaccines/contraception to slow population growth***– Available fertility control drugs and methods are only part of a comprehensive solution for addressing such a large-scale overpopulation due to the frequency with which they must be administered and the logistical and financial challenges of administering drugs to enough animals across broad landscapes. Our Coalition believes that scientifically-based use of fertility control, where proven effective, can be an important component of the management of wild horses and burros, but is not alone a solution to large-scale overpopulation.
5. ***Reinitiate proposed research and application of permanent sterilization*** – The Coalition recognizes sterilization of horses and burros as a potentially viable management activity authorized under the 1971 Act; but only if the safety and population-level effectiveness of sterilization can be demonstrated through adequate scientific evaluation, and if it is used in conjunction with direct and immediate removal of horses and burros from the range.

### CONCLUSIONS AND RECOMMENDATIONS

Given the current and growing numbers of wild horses and burros and the impacts to the rangelands, we urge you to work together with Congress to direct meaningful and fruitful changes to the management paradigm of the BLM’s Wild Horse & Burro Program. Congress must remove restrictions put in place via appropriations language, but BLM must also implement science-based actions to achieve ecologically-based management objectives.