



For America's Heritage

## Public Lands Foundation

P.O. Box 7226 Arlington, Virginia 22207

March 17, 2014

The Honorable Mary Landrieu  
Chairwoman  
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: Congressional participation necessary to help solve Bureau of Land Management wild horse and burro issues**

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

The Public Lands Foundations (PLF) is asking that the Congress assume a leadership role by actively participating in and supporting a solution to the intractable circumstances in which the Wild Horse and Burro Program in the Bureau of Land Management (BLM) finds itself.

The PLF is a national non-profit organization that advocates and works for the retention of America's National System of Public Lands in public hands, professionally and sustainably managed for responsible use and enjoyment by American citizens. PLF endorses and embraces the multiple use mission of the BLM. Our members are predominantly retired employees of the BLM and as such have spent a career dedicated to the sound management of these valuable lands and resources.

The BLM recently released an internal working document (attached) prepared by the BLM's Chief, Wild Horse and Burro Division. That document may well be the most accurate assessment of the wild horse and burro program. It confirms certain findings in the relevant 2008 GAO report.

The facts are:

1. The wild horse and burro program is insolvent.
2. There were 40,605 head of horses and burros estimated to be on public rangelands as of February 28, 2013. That is nearly 14,000 head in excess of the 26,677 determined to be the appropriate management level. Numbers have increased since a year ago with

published numbers believed to be low. And, unchecked, horses and burros can double their numbers in four years.

3. The BLM has neither the budget to gather excess horses and burros nor the budget or the space to place and care for additional gathered animals if they were gathered.
4. The demand to adopt wild horses has declined significantly over the last decades and has not kept pace with the number of horses than need to be removed from the range.
5. The BLM allocation of \$7.61 million for its adoption program in 2013 resulted in the adoption of 1,937 animals, which equates to more than \$3,900 per adopted animal.
6. Short-term fertility control drugs (PZP) that have been used have been proven to be ineffective in controlling horse and burro populations under existing management protocols.
7. Failure to remove excess animals and use long-term fertility control drugs, including some level of sterilization, will result in destruction of rangelands with attendant impacts of total loss of large mammal wildlife, impacts on threatened and/or endangered species, serious economic impacts and, ultimately, starvation of horses and burros.

Allowing horses and burros to continue to increase their numbers on western rangelands will, with certainty, have the results described above. Those results should be unacceptable to everyone.

It may be necessary to provide additional resources to the BLM on an interim basis to effect solutions to the program's problems; however, our purpose here is not to advocate for funding but to point to the need for Congressional involvement in crafting solutions.

The Public Lands Foundation stands ready to meet with you and your staff to make recommendations and participate in crafting solutions to the wild horse and burro issues.

Sincerely,

A handwritten signature in black ink, appearing to read "Edward W. Shepard". The signature is fluid and cursive, with the first name "Edward" being more prominent and the last name "Shepard" following in a similar style.

Edward W. Shepard, President

Attachment

*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-relocated 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 Hcrd" 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.