

Senator,

I'm writing to ask that you carefully evaluate HR7608 and the spending budget (Interior Appropriations bill) amendment for 2021 that requires "*the Bureau of Land Management to utilize \$11,000,000 of its Wild Horse and Burro Program budget to implement PZP humane, reversible fertility control to manage wild horse populations.*"

In and of itself, it does nothing to satisfy its stated objective to humanely manage wild horse populations. Why? PZP is a substance, not a method. Currently, PZP is primarily used as a relatively unmanaged part of helicopter captures and is not governed by the rigor required to ensure "humane, reversible fertility control." Without clear guidelines and constraints regarding its application and use, a desirable outcome is highly questionable

I am respectfully requesting that you propose an amendment to this spending bill that strictly prohibits funding for any sterilization process or any additional removals in, or from, any HMA that has failed to develop a robust, scientifically derived HMAP as required in BLM's own handbook, including transparent and inclusive public participation. Until we have established a rigorous planning process this program will never meet the expectations of the many Americans who support a humane, fair, and effective management plan for our wild horses and burros.

While PZP can be a useful tool, this amendment completely ignores an actual management plan. There is nothing in this legislation that defines how and when this product should be applied, a critical consideration. There are no stated guidelines for each herd to ensure genetic viability among herd populations, a key consideration when carefully managing a fertility control program. Other key components of a true management plan are simply absent, issues such as water access, critical habitat preservation, forage allocation, and adherence to animal welfare standards during invasive and dangerous roundups. Finally, AML (Appropriate Management Level), the numerical driver for removals, is, once again, left untouched and untempered by scientifically set goals.

In short, this amendment is nothing more than a directive to make a huge commodity purchase from one of the key backers of the so-called "Path Forward," a closed-door agreement (not a management document) made by corporate lobby groups. The substance (PZP) has value, but, in and of itself, it will not make any fundamental change to rectify the flaws that are pushing the program toward fiscal collapse or take an actual step toward the directive of sustainable management.

The 2013 National Academy of Sciences report clearly characterizes the unscientific processes and corresponding poor data quality used by BLM to "manage" this program — little has changed since that time. Of the 177 HMAs under BLM's control, only 7 have produced HMAPs (Herd Management Area Plan) in spite of a legal mandate to do so as outlined in BLM's own handbook.

Instead of a science-based management plan we are given politics over law as profit-driven interests drive the program to prioritizing self-serving business goals through the implementation of "authorities" (removal, for example, is an authority, not a mandate) while pushing aside an actual management plan. This would be the same as BLM accepting one broad-brush Plan of Operations (PoO) for mining management nationwide, an absurdity. The HMAP is the site-by-site management plan, the equivalent of a mining PoO.

And, as noted by the NAS, the accuracy of AMLs set by various BLM offices, ad hoc, is highly suspect —these are not scientifically set targets and do not reflect the actual carrying capacity of the range. All this, and yet we are set to blast ahead with mass removals in 2021, with no management plans, relying on the often dismal and obstructionist track record of the BLM (consider the fate of the 2016 PZP program at Fish Creek, a promising first step towards an HMAP, destroyed by the very groups involved in asking Congress for an \$11 million PZP allocation, or, likewise, the inconsistent implementation of the agreed-upon animal welfare policy known as CAWP) at a time when our federal government has shown a near complete lack of interest in environmental standards of any kind, not to mention animal rights and humane treatment, governed by a program (Path Forward) whose targets may actually be set by animal agriculture interests, extraction industries, and special interests who plan to benefit financially from its implementation (for example, PZP sales).

Again, PZP, can be an effective tool, when carefully managed, for “humane, reversible fertility control.” But it is just that, a tool. It is not a management plan or a “silver bullet.” Without a data-driven and scientifically set plan, this massive purchase is primed to fail in the field. The House is not giving us management with this commitment to PZP, but rather, a larger taxpayer bill that, without a plan, is likely to yield questionable results. Without a real plan, and at the foundation, actual management planning, this program will continue to founder, obligate the taxpayer to throw more money into a program on the verge of collapse, and, more importantly, fail the iconic herds that most Americans so value.

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Sincerely,

contact info