

THE PATH FORWARD FOR MANAGEMENT OF BLM'S WILD HORSES & BURROS

ASPCA

American Farm Bureau Federation

Society for Range Management

Humane Society Legislative Fund

Public Lands Council

Return to Freedom Wild Horse Conservation

National Horse and Burro Rangeland Management
Coalition

Eureka County, NV County Commission Office

Humane Society of the United States

National Cattlemen's Beef Association

Beaver County, UT County Commission Office

American Mustang Foundation

Utah Governor Office

The primary objective of this proposal is to develop an economically and environmentally viable, humane, non-lethal, and feasible long-term management plan for wild horses and burros in the American West. The current program is unsustainable and needs redirection.

We¹ propose the following solutions for the short and long-term health of our wild horses and burros along with our Western rangeland: (1) Relocate removed wild horses and burros to more cost-effective pasture facilities, (2) Contract with private parties to secure lower-cost leasing of land for long-term humane care of removed horses and burros, (3) Apply proven, safe and humane population growth suppression strategies to every herd that can be reached utilizing trained volunteers, Agency staff, and animal health professionals, as individual HMAs dictate to prevent repeated gathers and (4) Promote adoptions in order to reduce captive populations and costs.

If the BLM can work with private partners to achieve each of these goals, the agency will be back on a financially sustainable and more humane management track. All signatories support this plan and are committed to its implementation. If the BLM and Congress provide adequate direction, funding, and execution, this plan should result in measurable wild horse and burro population decline making progress towards the BLM's Appropriate Management Level (AML). Signatories agree to yearly meetings to review progress towards objectives. The BLM should also produce a report to Congress at years 3, 5, and 7 to ensure progress is being made towards thriving ecological balance on the range.

EXECUTIVE SUMMARY

Wild horses and burros are “living symbols of the historic and pioneer spirit of the west,” and an integral part of American cultural heritage as stated in the Wild Free-Roaming Horses and Burros Act (WFRHBA). Management of these federally protected herds is no easy task, but one that many Americans support and that the Bureau of Land Management (BLM) has stated it is required by law to perform. The BLM's attempts to curb population growth, mainly through roundups and removals, have not sufficiently slowed the growth of wild horse and burro populations on the range. Concerns about the cost of the Wild Horse and Burro Program and impacts to rangeland health have prompted some to recommend the use of lethal population control methods. We collectively propose the following solution as a viable way to manage wild horses and burros through non-lethal methods.

All wildlife species on the Western ranges are managed by state wildlife agencies, and all livestock on Western ranges are managed by livestock owners. Wild horses and burros are unique in the ecosystem because they are not managed by either, through hunting or allotment management plans. Through managing the timing, intensity, and length of use for other species, managers keep the ranges healthy and sustainable. Like all other species, wild horses and burros need to be properly managed so that all species can thrive on healthy rangelands.

¹ The we referenced throughout document refers to collective signatories below.

We propose a solution that will eventually release the BLM from the costly cycle of roundups and holdings, while reducing the number of horses and burros on the range and making progress towards the agency determined appropriate management level (AML):

- Conduct targeted gathers and removals at densely populated Herd Management Areas (HMAs) to reduce herd size and make progress towards AML.
- Treat gathered horses and burros with population growth suppression tools prior to being returned to the range. Reversible methods must be administered to an appropriate percentage of mares (generally close to 90%) to control populations, with some flexibility depending on modeling of range and herd parameters.
- Relocate horses and burros in holding facilities, and those taken off the range, to large cost-effective, humane pasture facilities funded through public-private partnerships.
- Promote adoptions in order to help reduce captive populations and costs. The BLM is currently spending \$2,250 (\$3,250 with incentive) per adopted horse to promote adoptions that ultimately provide considerable cost savings to the agency. Investing in the adoption process for each horse will reduce or eliminate the estimated \$46,000 per horse expenditure in off range holding over the course of their lifetime.

The four tiers of this approach – gathers and removals, alongside population growth suppression strategies, public- private partnerships, and adoptions – are all crucial to the ultimate success of the program. Failure to effectively implement any part of this program jeopardizes the success of a holistic and sustainable wild horse and burro program. If employed correctly, this plan will result in a sustainably managed population over the next two decades. We collectively support this humane, effective, and financially sustainable approach.

The signers of this agreement hold divergent views on some aspects of wild horse and burro management but nearly all stakeholders share common goals for rangelands: ecosystem health, the humane treatment of animals, and fiscal responsibility. With this plan, horses and burros will be managed humanely, the government's costs will decrease over time, and multiple use federal public lands will be managed to make progress towards AML goals. We have an opportunity, and an obligation, to solve this challenge collectively through a rational, judicious plan that embodies each of these shared goals. Now is the time to act. Failure to act now will result in continuing irreparable, long-term damage to our natural resources.

THE PROBLEM

The Bureau of Land Management (BLM) has not implemented an effective, financially sustainable framework to manage wild horses and burros, now some 40 years after the enactment of the Wild and Free-Roaming Horses and Burros Act. The agency has been limited in the range of tools it has had at its disposal. Because of logistics and controversy, the management of wild horses and burros on

public lands has proven unwieldy: currently, horses and burros reproduce quickly on the range and are affecting rangeland ecosystems, while most BLM short- and long-term holding facilities are over capacity. Until recently, when budget constraints prevented nearly all management of wild horses and burros on the range, the BLM controlled populations by rounding up specific herds every 2–4 years and removing large numbers of animals to attain AMLs. Absent on range fertility control, these removals resulted in a large population of horses and burros under the BLM’s direct care. The BLM developed two types of holding facilities to maintain these horses and burros — contracted pastures that cost \$1.82–\$2.42 per horse per day, and short-term corral facilities (i.e. feedlots) that cost \$4–\$7 per horse per day. This excludes costs for round-ups. As of March 13th, 2019 the BLM maintains 36,906 wild horses and burros in large pasture facilities, and 14,029 horses and burros in corral facilities.

According to the National Academy of Sciences, removal of excess horses alone can actually facilitate a higher growth rate in wild herds due to decreased competition for forage. This means that the BLM’s current management techniques are likely increasing population growth rates. Equine herds typically grow approximately 15%–20% per year, but studies have shown that growth rates are higher in herds where removals have been conducted.

Had the BLM coupled these removals with a sufficient on-range fertility control program, recruitment rates would be far lower. Between 2012 and 2018, the BLM treated fewer than 4,353 horses with fertility control, and released many gathered horses back onto the range without fertility control treatment.

As of March 13, 2019, the BLM estimates the population of wild horses and burros on federal lands at over 81,951— over three times greater than the agency’s nationwide AML goal of 26,690.

Mismanagement has led to negative impacts to the long-term health of rangeland ecosystems, raising serious concerns with maintaining the status quo management practices for private livestock grazing, wildlife vitality, and wild horses and burros. Controversy over the allocation of water and forage has polarized stakeholders, compromising our ability to find common ground solutions.

THE SOLUTION

While there is continuing debate about what constitutes sustainable wild horse and burro populations on the range, the BLM has stated it is required by law to maintain populations at currently established national AML. The result of recent modeling indicates that those levels can only be reached by a combination of large-scale removals, off-range relocation, and fertility control. Removals must be conducted under the following conditions: (1) Removals must focus on those areas of most immediate concern due to potential conflicts with native wildlife, rangeland degradation, and human-horse conflict; (2) population growth suppression strategies must be implemented as determined on an HMA by HMA basis; (3) wild horses and burros removed from

the range must be relocated into less expensive holding facilities, and where possible, public-private partnerships with landowners and non-profits must be implemented; (4) signatories will work with BLM and provide assistance to ensure that better marketing-increases adoptions and reduces captive populations and costs; and (5) a Rangeland Restoration Plan should be funded and implemented when HMAs achieve sufficient progress towards AML.

I. REMOVALS

Assuming an 18% population growth rate absent removals, rangeland populations will be approximately 90,000 to 95,000 by 2020. While removals to achieve AML are a financial burden, the BLM has determined that they should be conducted to alleviate existing concerns with the condition of BLM's rangelands. To get closer to the BLM's assigned nationwide AML, removal numbers need to be higher initially to allow fertility control to catch up with the population (in other words, to implement fertility control alone or alongside current *average* removal numbers would not achieve population balance and control because the number of foals born per year would still exceed the number of horses removed). Modeling shows that for the first three years, 15,000-20,000 horses would need to be removed per year. These numbers will then drop to 5,000-10,000 per year for the remainder of the proposal term as fertility control takes effect.

Some areas cause heightened concerns due to rangeland degradation, and direct political conflict with the BLM's multiple-use mandate. With that in mind, we suggest that the agency prioritize those areas for immediate attention.

The BLM could begin removals in 2020 focused on those areas, gradually shifting focus in subsequent years to removals in all HMAs where wild horse and burro populations exceed the AML. The combination of large-scale removals/relocations and the large-scale implementation of fertility control (as discussed below) would eliminate the necessity of future large-scale gathers for removal purposes. If necessary, smaller targeted gathers could be conducted to maintain population levels in strategic locations. Removed horses and burros would be relocated to pasture facilities or contracted sanctuaries (as discussed below). The necessity of repeated supplemental feed and water to these herds should be viewed as an indication that the range cannot support current populations in a given area, and the use of such tools should therefore be in conjunction with capture and removal of excess horses.

All removals must be conducted in strict compliance with the Comprehensive Animal Welfare Program (CAWP) as outlined by the BLM.

II. FERTILITY CONTROL

All future removals must be coordinated with ongoing, on-range fertility control programs to prevent subsequent population growth within the remaining equine population. Modeling shows the need for a large-scale fertility control program, which ensures that 90% of the horses and burros remaining on federal public lands are treated with fertility control to avoid need for future large-scale removals.

To achieve this goal, the BLM must regularly treat a significant portion of mares in each HMA. On HMAs where repeated gathers are a realistic option, the agency should treat ($>90\%$)² of the remaining mares in every HMA. For HMAs using helicopter gathers, the agency must commit to coupling the removals with detailed gather plans that target a high percentage of the area's population. The agency must then treat all mares returned to the range with population growth suppression, and continue to treat mares in the HMA in successive years to ensure that a sufficient number of mares ($>90\%$) remain treated.

In areas where baiting is possible, BLM staff must administer treatment through opportunistic darting. If that is not possible in all locations, gathers without removals in subsequent years must take place to ensure repeated treatments.

Trained and approved volunteers and university programs can be utilized to aid with darting programs, identification of individual horses and burros, behavioral observation, and data collection as the BLM needs.

Students and volunteer organizations can also be used to support water and habitat restoration on the range.

The BLM should pursue further research into on-range fertility control and incorporate results into long term management plans.

The BLM should be aggressive about adopting new population growth suppression tools as they become available.

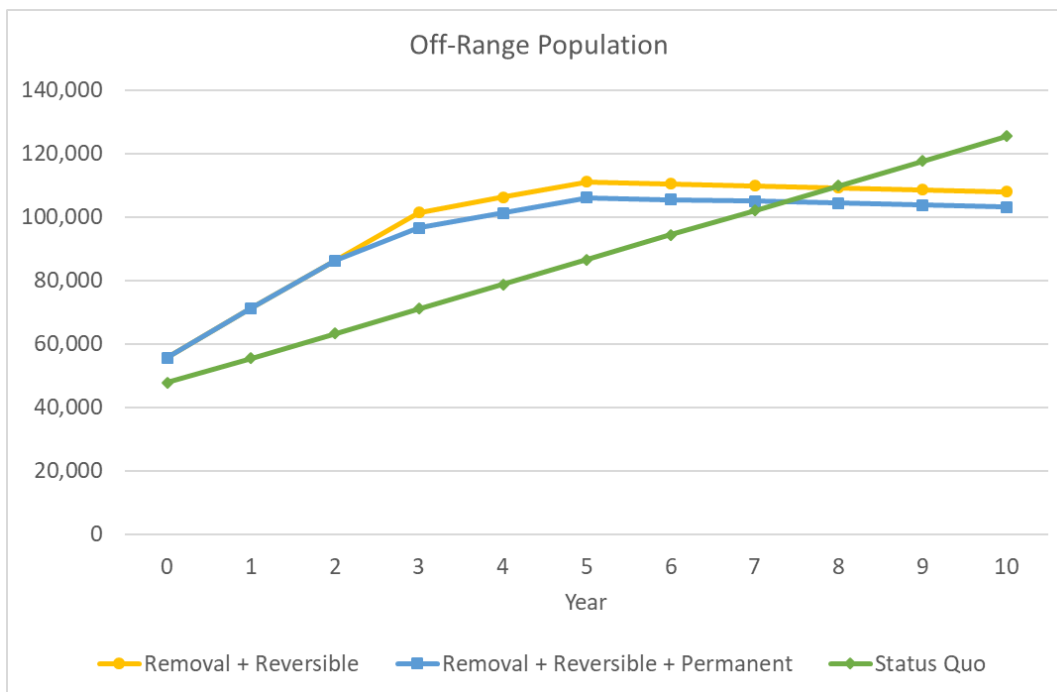
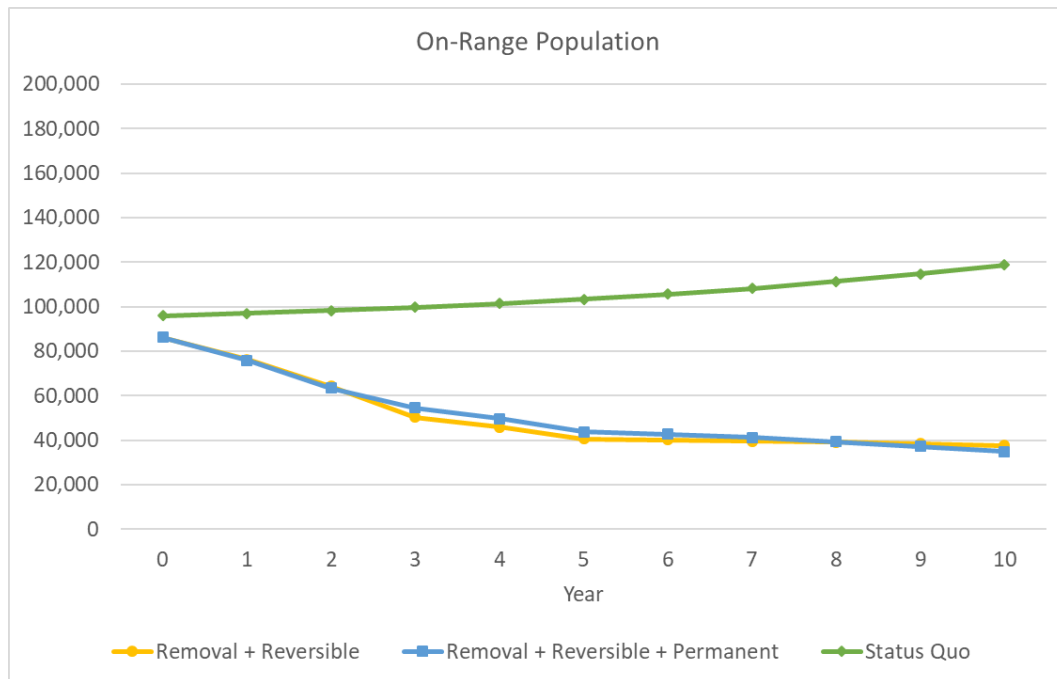
The BLM should be aggressive about adopting new technologies such as federally authorized drones and microchips as they become available and are proven to be safe and effective.

Fertility Control Population Projections:

The BLM has suggested a variety of on-range strategies to suppress wild horse and burro population growth. Below, we analyze three different management strategies and their effects on on-range and off-range population growth. Our preferred method is shown in yellow and labelled "Reversible + Removal", as it can be instituted by the BLM immediately. This curve depicts population growth over time when utilizing removals and yearly reversible population growth suppression tools. The blue line labelled "Removal + Reversible + Permanent" depicts population growth if removals, permanent sterilization, and yearly immunocontraceptives are employed. The Status Quo strategy, the green line, does not achieve adequate population reduction, and results in an increasing number of equids held off-

² Applicable to modeled immunocontraceptive vaccines.

range. Reversible + Removals and Removals + Reversible + Permanent both reduce the population to within 20% of AML over the 10-year period.



From this point, it will take approximately 10 years to get the population close to the BLM's current desired AML of 26,690 based solely on the use of ZonaStat-H or another yearly population growth suppression tool alongside removals.

Longer-lasting population growth suppression tools will lower costs and reduce the need for yearly treatment, and will speed population decline. As such, additional tools should be implemented as soon as they become feasible.

To further bolster the efficacy of this proposal, the agency could implement reasonable sex-ratio skewing, at a 70/30 skew, in herd management areas where ratios are not naturally skewed towards a larger male population.

III. RANGE RESTORATION

Some ranges are already damaged in ways that are harmful to wildlife, range plants, and the remaining wild horses and burros. Restoring ranges to a healthy state will require deliberate and scientific human intervention. Range treatments should immediately follow gathers and be done at a scale that is effective in creating adequate forage for wildlife, domestic animals, and wild horses and burros. Treatments should be planned in a way that allows the area to be rested until treatments are established enough to withstand grazing.

IV. LESS EXPENSIVE HOLDING OPTIONS

Every day, the BLM spends \$1.82 per horse in long term holding pastures and an average of \$4.99 per horse in corral facilities. A shortage of pasture facilities has forced the agency to use corral facilities for long term purposes—at more than twice the expense. The BLM currently holds 12,433 horses in corral facilities. The agency estimates that each of those horses costs approximately \$46,000 over the course of their lifetime. We propose that the BLM relocate corralled horses and burros, along with any additional removed horses and burros, to more cost-effective private pastures. Private pastures will help reduce population levels in individual HMAs to enable proper management, reduce the agency's management costs, and provide humane and more natural living situations. It also ensures that lethal methods do not become the default public policy. We commit to partnering with BLM to encourage and facilitate the creation of these options.

While this proposal requires an additional upfront investment to achieve this shift in focus, it will result in significant long-term cost savings. We must identify adequately large pasture options that can accommodate not only the horses and burros currently housed in corral facilities but also additional wild horses and burros removed from the range. The overarching goal is to ensure that future gathers, after progress towards AML is made, will be conducted solely to administer a comprehensive, mandatory fertility-control program. The implementation of ongoing on-range fertility control will mean fewer horses and burros removed, which will ultimately enable a phase-out of holding facilities. As holding facilities are phased out, BLM funds will become available to pay for continued population growth suppression tools and range restoration.

Large-Scale Private Pasture or Sanctuary Facilities

We propose that the BLM issue a Request for Proposal (RFP) for organizations and entities throughout the United States that can provide more cost-effective humane, long-term, off-range pasture for the wild horses or burros coming off the range. The BLM would retain ownership of and be accountable for ensuring protection of the animals removed from the range, as well as enforcing consequences for non-compliance. Federally-protected status will be maintained.

The long-term, off-range pasture facilities should be located on private land, and should not be located in areas within or adjacent to Herd Management Areas, Herd Areas, or Horse Territories. These pastures should be located in geographic areas that are suited ecologically to sustain year-round grazing, whether by utilizing pasture rotation or hay production, by large numbers of horses and not have adverse ecological effects.

The BLM should pursue large scale off range pasture contracts with entities capable of housing a large number of horses under a single contract to save administrative costs associated with contracting, environmental compliance, and BLM oversight.

This strategy will save public funds by decreasing the average per-horse cost of off-range management and contracting, compared to the current cost-prohibitive corral facilities, and will allow the animals to live out their lives in natural pasture settings.

Non-profit 501 (c) 3 sanctuary organizations may also choose to enter into long-term off-range pasture agreements with the BLM. The agency would then maintain title of the animals to ensure their federally protected status.

Qualified non-profit, private landowners, or a combination of the two are an additional alternative, reducing the BLM's holding costs while providing removed horses a life-long safe refuge.

Private pasture and sanctuary facilities would be encouraged to provide programs to educate the public about the connection between managed wild horse and burro populations and rangeland health.

All facilities involved in the program will contractually agree they will not destroy healthy, unadopted, wild horses and burros or allow sales of wild horses and burros in a way that results in their destruction for processing into commercial products.

All facilities involved in the program will ensure that wild horses and burros do not return to the ranges. If horses and burros inadvertently escape from these facilities, the facilities will bear the cost and responsibility to gather and return the horses and burros within days.

V. ADOPTIONS

Over the course of the past 5 years, the BLM has only been able to adopt between 2,000-4,000

wild horses and burros a year. Recognizing that this number is insufficient to lower populations in holding facilities in any meaningful way, if this plan is adopted our organizations will work together to create an adoption program to supplement the BLM's current adoption program that will aid in increasing the adoption of horses relocated into the above mentioned private facilities. The Wild Horse and Burro Program plays a key role in reducing the number of animals on the range. However, adoption demand has declined in recent years.

Upon acceptance of our proposal, our organizations are committed to helping increase wild horse and burro adoptions in partnership with the BLM. We will develop and implement a program to encourage the public to adopt a wild horse or burro through the implementation of educational training/mentoring programs with adoptable horses and burros and a marketing plan, which will supplement the agency's current program.

We have determined that the largest possible target audience that is not fully tapped currently by the BLM are potential horse and burro owners on the East Coast. We will work to increase publicity across the country with a specific focus on the East Coast to aid in increasing adoption numbers.

Another under-utilized opportunity may be with other federal agencies. We will support humane imprinting, gentling and training horses and burros that can then be used by USFS, mounted law enforcement, and other government entities.

We will use our volunteer network and extensive outreach capabilities to promote adoptable horses and burros to potential adopters through the use of our social media and email channels.

APPROPRIATIONS REQUEST

The groups involved with this effort will be seeking appropriations language in support of this path forward.