Review of the 2026 BLM Wild Horse and Burro Population Estimates Report

Prepared by Wild Horse Education | March 2026

Summary

The Bureau of Land Management's *2026 Wild Horse and Burro Population Estimates*, issued as of March 1, 2026, reports a nationwide on-range population of 85,466 wild horses and burros — 61,523 horses and 23,943 burros spread across 10 western states. The total Appropriate Management Level (AML) high end for all managed Herd Management Areas (HMAs) stands at 25,592 animals — broken down as a horse high AML of 22,673 and a burro high AML of 2,919.

The 61,523 estimated wild horses represent **271% of the horse high AML**, while the 23,943 estimated burros represent a staggering **820% of the burro high AM**L — placing the combined on-range population at approximately 334% of the total stated high AML.

These AML figures themselves carry a critical caveat: the overwhelming majority of individual HMA AMLs were established between the late 1970s and mid-1990s — most between 1982 and 1995 — set under intense political pressure from the Sagebrush Rebellion and livestock lobby rather than ecological science, and almost none have been scientifically revised since. The **2008 GAO** confirmed BLM had set AML for 197 of 199 HMAs **without formal, consistent guidance**, and the **2013 National Academy of Sciences** reiterated what oversight bodies had found in 1980, 1982, and repeatedly since: A**ML is not based on rigorous or consistent range data**. — In other words, the 25,592 ceiling is not a scientifically derived carrying capacity — it is a decades-old political number, and the 820% burro overage and 271% horse overage are calculated against that already-questionable baseline.

However, the **high AML is not the operational target of BLM roundup operations. The low AML is.** BLM policy is to drive removal operations to the lowest end of the AML range — and the cumulative national low AML for all 175 HMAs (the number of actively managed wild horse and burros HMAs dropped from 199 in 2008[1]) totals only approximately **15,374 animals** (roughly 13,273 horses and 2,101 burros).

Against a reported on-range population of 85,466, that means BLM considers **70,092 animals "excess"** and subject to removal. The current on-range population stands at approximately **556% of the national low AML** — the actual removal benchmark. This distinction is not a footnote; it is the operational engine driving the accelerating gather schedule and the rationale for proposals to use lethal management.

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[1] Originally there were 303 Herd Areas designated after the passage of the 1971 Wild Free-Roaming Horses and Burros Act, representing approximately 47 million acres of public land. In **1987**, BLM asserted it had "erred" in its original count and revised the number down to **270**. Of those 270, the agency determined that only **199** would be managed long-term for wild horses and burros, eliminating the animals from 68 areas citing conflicts with existing land uses. The elimination of these designated territory had nothing to do with the “lack of sustainability” data-analysis for horse/burro herds.

It is important to illustrate how this plays out on the ground, consider **Carter Reservoir HMA** (CA0269) in northern California: the 2026 report records 473 horses against a high AML of 35 and a **low AML of only 25**. That is the actual target number BLM intends to achieve — removing 448 of 473 horses, a 95% reduction. After reaching low AML, BLM's plan calls for treating all 15 remaining mares with the GonaCon immunocontraceptive vaccine. A herd of 25 horses sits far below any recognized genetic minimum viable population threshold (generally cited at 150+ animals for long-term viability), placing this unique, primitive dun-factor phenotype at existential risk. Any other animal whose population would reach the “goal” for “management” by BLM would be considered critically endangered.[2] The low AML at Carter Reservoir is not a management tool — it is a blueprint for functional elimination of the herd.

Of the 8,080 animals BLM characterizes as "placed into private care," a record and rapidly growing proportion were transferred through the **Sale Authority program** — a mechanism created by the 2004 Burns Amendment that allows BLM to immediately transfer legal title for as little as $25 per animal, with no waiting period and no post-transfer federal oversight. Once title is transferred, federal protections under the 1971 Wild Free-Roaming Horses and Burros Act no longer apply. Sale Authority horses are being driven from BLM sale events **directly to kill buyer auction yards** within hours or days of purchase.

The trajectory of Sale Authority transfers over time tells its own story. In the years immediately following the 2004 Burns Amendment, sales were relatively low: just 87 animals in FY2014. After the 2016 "Path Forward" / "Ten Years to AML" corporate lobby document was incorporated into BLM's planning framework, both removals and sales began a dramatic climb. Sales reached 582 in FY2017, then spiked to 1,201 in FY2018

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[2] If a distinct population segment of bighorn sheep — or any wildlife species — were driven to 25 individuals in a specific geographic area, the response under existing federal law and conservation science would be immediate and categorical:

Under the Endangered Species Act (ESA), a distinct population segment (DPS) at 25 individuals would almost certainly qualify for **emergency listing** as Endangered. The ESA requires listing based on threats to the species "in a significant portion of its range" — a localized population of 25 is textbook criteria. Recovery plans would mandate *increasing* population, not maintaining it at that floor.

Under conservation biology, 25 individuals falls catastrophically below any recognized minimum viable population (MVP) threshold. The widely cited MVP floor is **50 individuals** to avoid inbreeding depression in the short term, and **500+ (or 5,000 effective breeders)** for long-term genetic viability (the 50/500 rule, Franklin 1980; Frankham et al.). At 25 animals, genetic erosion, inbreeding, and demographic stochasticity make local extinction highly probable within a few generations regardless of fertility control.

The stark contrast: The same federal government that would mobilize emergency resources, litigation shields, and recovery mandates to protect 25 bighorn sheep in a discrete habitat — with zero tolerance for further reduction — is simultaneously setting a **legal management target of 25 horses** at Carter Reservoir and calling it appropriate management. The horses receive no ESA protection because the 1971 Act was written to be their equivalent protection. But BLM administers the 1971 Act in a manner that produces outcomes the ESA was specifically designed to prevent for any other species.

The Carter Reservoir herd also carries a documented **primitive dun-factor phenotype** — a genetically distinct characteristic. Under any other wildlife management framework, that genetic distinctiveness would be a factor *increasing* protection priority, not ignored entirely.

alone after BLM briefly changed policy to allow buyers to purchase up to 24 animals per day — more than the prior five years combined. The policy was partially rescinded in 2019 under public pressure, but the underlying trajectory continued.

Sale Authority transfers spiked from 1,509 total in FY2024 to **3,718 in FY2025** (2,387 horses + 1,331 burros) — a nearly **150% increase in a single year** — and in early 2026 BLM quietly updated its policy language from "four animals per year" to "four animals **every six months**," effectively doubling the per-buyer throughput without any public process. In 2025 alone, more than 24,000 domestic and wild equines were exported to slaughter, 4,000 more than the prior year. The BLM's own February 2026 press release celebrating "record placement" numbers made no distinction between legitimate adoptions and Sale Authority title transfers funneling federally-protected animals into the slaughter pipeline.

Removals tell the same story of post-2016 escalation. From 3,320 removals in FY2016, numbers climbed steadily: 4,209 in FY2017, 11,472 in FY2018, 13,666 in FY2021, then **20,193 in FY2022** — a single-year record. Between FY2020 and FY2023, BLM removed approximately **50,000 animals** from the range — nearly double the entire on-range population that Congress sought to protect in 1971. Despite this unprecedented removal pace, the 2026 report shows the on-range population has rebounded to 85,466 — confirming the NAS warning that removals trigger compensatory growth and increase the throughput of animals processed through the system.

In 2022, Wild Horse Education published a foundational review identifying critical structural failures in the BLM Wild Horse and Burro Program Population Statistics Report: the absence of Herd Management Area Plans (HMAPs), the scientific invalidity of politically-set AML numbers, outdated population survey methodologies, and the dangerous trajectory of a "remove and stockpile" management model.

Four years later, the 2026 report demonstrates that none of these structural failures have been corrected — and several have deepened significantly.

The Numbers: What the 2026 Report Actually Shows

National Totals and AML Comparison

The 2026 report lists 175 HMAs across the ten managed states with a combined high AML of 25,592. The 85,466 reported animals represent a population that has been managed under a national AML that has barely shifted from the 26,715 cited in the 2020 BLM Plan (and the original politically set AML immediately after the 1971 Act). This means the agency's own target population — already criticized by the National Academy of Sciences (NAS) as not based on rigorous or consistent range data — has remained effectively frozen for decades while the reported on-range population continues to be cited as evidence of “crisis.”

The 2026 Statistics Report also reflects one of the program's most persistent flaws: Population data of wildly inconsistent age is used to compute a national "overpopulation" figure.

Some HMAs have had no population survey since 2017 or 2018; the Waucoba-Hunter Mountain HMA in California last received a population inventory in April 2011; Kingtop in Utah was last surveyed in February 2006. These decades-old baseline figures are still included in a report framed as a current population estimate. The 2022 review identified this same problem — HMAs with last population counts as old as 2005 and 2010 — demonstrating it remains unresolved.

The real significance of the stale-data critique is not the headline number — it is that BLM uses these outdated figures to **justify site-specific removal operations** and funding requests. The “Population Statistics report” is the baseline data Congress translates to dollars in the Appropriations bills. Using the outdated information that inflates a “crisis” increasing programmatic funding.

State-HorsesOn-Range-HorseHighAML-HorseofAML-BurrosOn-Range-BurroHighAML-BurroofAML-TotalOn-Range-TotalAML-TotalofAML

State	Horses On-Range	Horse High AML	Horse % of AML	Burros On-Range	Burro High AML	Burro % of AML	Total On-Range	Total AML	Total % of AML
Arizona	268	240	112%	13,546	1,436	943%	13,814	1,676	824%
California	3,534	1,771	200%	4,933	465	1,061%	8,467	2,236	379%
Colorado	1,669	827	202%	0	0	N/A	1,669	827	202%
Idaho	564	617	91%	0	0	N/A	564	617	91%
Montana	195	120	162%	0	0	N/A	195	120	162%
Nevada	37,426	11,987	312%	5,146	824	625%	42,572	12,811	332%
New Mexico	97	83	117%	0	0	N/A	97	83	117%
Oregon	5,994	2,676	224%	86	24	358%	6,080	2,700	225%
Utah	4,611	1,786	258%	232	170	136%	4,843	1,956	248%
Wyoming	7,165	2,566	279%	0	0	N/A	7,165	2,566	279%
TOTAL	61,523	22,673	271%	23,943	2,919	820%	85,466	25,592	334%

Chart Highlights:

Oregon: 86 burros across the entire state of Oregon — distributed across two HMAs — produce a "358% over AML" line item because the BLM set the burro AML for all of Oregon at **24 animals**. That is not an ecological determination. It is a political number, set decades ago, generating a crisis-level percentage from a population that would fit comfortably in a single pasture.

New Mexico: 97 horses across the entire state, against an AML of 83, generates a "117% over AML" funding justification. Fewer than 100 horses on nearly 29,000 acres of HMA land are framed in the same "excess" language used to justify historically-unprecedented removal operations.

Nevada: Remember, NV is supposed to have more wild horses and burros than all other states combined (Nevada is the most federally owned state in the nation — approximately 80% of its 70.3 million total acres is federally managed).

Even at the (severely flawed and inflated) **reported on-range population** — which BLM calls a crisis — **wild horses and burros** in Nevada consume approximately **510,864 AUMs per year**. That is roughly **25% of the 2 million AUMs allocated to private livestock on the same landscape.**

At the **high AML of 12,811**, wild horses and burros would consume only **~153,732 AUMs** — about **7.7% of the livestock allocation.**

At the **low AML of 7,597** — the actual roundup target BLM drives every gather operation toward — wild horses and burros in Nevada would consume only **~91,164 AUMs per year**, roughly **4.6% of the livestock allocation**.

Nevada in a nutshell: BLM spends hundreds of millions of dollars, removes tens of thousands of wild horses and burros, and generates headlines about an "overpopulation crisis" — **in order to drive wild horse and burro forage consumption from 25% of the livestock allocation** (where it is right now using BLM numbers) **down to 4.6% of the amount of forage consumed by privately owned domestic livestock** in the entire state.

The AML Problem: Unchanged and Uncorrected

Zero-AML HMAs and Skewed Statistics

The 2022 report specifically identified the distortion created by including HMAs with a zero AML in national "over AML" statistics, using Goldfield, Nevada as an example: an AML of 0 with 246 horses produces an entry of "24,600% over AML" that inflates the national overpopulation percentage.

The 2026 report repeats — and in some cases dramatically expands — this same statistical distortion:

- **Hickison Summit (NV):** 155 horses; AML = 0. Listed as **15,500% over AML**
- **Goldfield (NV):** 144 horses; AML = 0. Listed at **14,400% over AML** for horses
- **Bullfrog (NV):** 21 horses; AML = 0. Listed at **2,100% over AML**
- **Muddy Mountains (NV):** 19 horses; AML = 0. Listed at **1,900% over AML**
- **Montezuma Peak (NV):** 106 horses; AML = 4. Listed at **2,650% over AML**

These statistics are structurally misleading. An HMA that has been designated for zero horses — not through a completed NEPA process converting it to a Herd Area, but through a politically-set AML — **creates an absurd and mathematically false impression of catastrophic overpopulation.** The 2022 report warned that "these assertions are severely skewed by inclusion of HMAs that have an existing horse population, yet have an AML of zero (0)." In 2026, that warning remains unheeded.

If this were removed from the “asserted national over AML” the percentage point drops by 8%. If we include the HMAs we list as statistically suspect due to the really old data used, the national “over AML assertion” drops by nearly 14%.

It appears their true function in BLM reporting is to generate eye-catching percentages over “AML” like 15,500% and 14,400% that anchor a narrative of catastrophic overpopulation, when the underlying numbers involve fewer horses than a single small ranch.

Strip out the scientific validity of the AML those percentages are calculated against, and the entire framework requires reexamination.

AML Goal	0	1-10	11-25	26-50	51-100	101-150	151-200	201-300	301-400	>500
WH	4	9	22	28	37	19	15	7	2	2
WB		3	5	1	5	4	2		1	
WH&B		1		2	3	3			1	1
Totals	**4**	**13**	**27**	**31**	**45**	**26**	**17**	**7**	**4**	**3**

Above: chart showing how BLM set AMLs are distributed nationally. Only 31 HMAs have a population set larger than the minimum required to maintain genetic solvency.

AML Remains Scientifically Unjustified

The national AML has shifted only marginally from the levels the 2020 BLM Plan embedded in its reporting to Congress. **In 2022, the national total was cited as 26,715; the 2026 report shows a high AML of 25,592** — effectively the same figure, now reflecting years of gathers that brought individual HMAs to AML without any new, scientifically-grounded analysis expanding AML upward or in any way creating an actual carrying capacity mathematical equation.

As our 2022 report documented extensively, the National Academy of Sciences (NAS) concluded in 2013 that AML is not set based on rigorous and consistent range data and analysis — a finding consistent with GAO reports going back to 1990.

The BLM 2026 report offers no evidence that this has changed. AMLs on many HMAs were set decades ago, based on political pressure rather than ecological science, and remain embedded in the system as the primary driver of removal decisions.

The 2026 report does reflect one notable change: the addition of a "Low AML" column alongside the "High AML," with footnotes noting that where no low AML was established, BLM uses 60% of the high AML as a proxy. **This is not a scientific determination — it is an arithmetic shortcut applied to targets that were never scientifically validated in the first place.**

Survey Methodology: Persistent Questions

The 2026 report notes that the primary survey method used across most HMAs is the **simultaneous double count method**, with ground counts still used on smaller areas where animals are easier to identify. Footnote 5 in the state tables clarifies that population counts include "statistically analyzed aerial survey data, aerial survey direct counts, ground counts, post gather inferences, and prior year's reported populations" — the last category being particularly significant.

"Prior year's reported populations" is not a survey. It is a mathematical extrapolation — typically the application of a growth rate assumption to a prior count, with or without adjustment for removals. The 2022 report identified the BLM's reliance on a blanket 20% annual growth rate as scientifically contested, with the NAS noting actual growth can range from 7% to 24% depending on site-specific conditions and recent removal history. High-removal events have been shown to trigger compensatory population growth, meaning the same assumptions used to justify removal also accelerate the population rebound.

The inclusion of extrapolated populations alongside direct survey data — without consistent disclosure of which method produced each figure — makes it impossible to evaluate the reliability of the national total. Some figures in this report are based on surveys conducted within the last year. Others are projections from surveys conducted years or even a decade ago. They are aggregated into a single national number presented to Congress and the public as a population estimate.

The Burro Figures: Methodology Failures Before the Numbers that "Scream Crisis so Congress Must Give Us Loys of Money"

Before analyzing the burro population figures in the 2026 report, it is essential to confront a foundational problem: the AML against which burro populations are measured was constructed using a methodology that does not reflect what burros actually eat. Burros are not horses, nor are they cows.

BLM's range analysis for establishing burro AML has historically focused on **grass availability** — the forage most easily measured in standard range utilization studies. But burros are not primarily grass grazers.

Published research, including a 2023 USGS study using DNA metabarcoding of fecal samples, confirms that feral burros employ a **mixed feeding strategy heavily weighted toward forbs, shrubs, and woody browse**. At Lake Pleasant HMA in Arizona, burro summer diets consisted of 46% woody plants and 26% forbs, with graminoids (grasses) making up only 18%. In juniper shrubland ecosystems, forbs and grasses together dominated — but woody browse remained significant. The BLM's own Handbook states that AML analysis shall include "in-depth evaluation" of forage, yet burro AMLs across the West were set using range assessments that analyzed predominantly grass production — systematically undercounting the forage base burros actually use and overstating the competition between burros and livestock.

This is how a burro population can remain healthy and grow to more than 1,000% over an asserted AML. The AML never actually analyzed how many burros a range could sustain.

A site-specific example: *Nevada's burro outliers require special examination.* ***Gold Butte HMA*** *in Clark County covers* ***178,564 acres*** *— an area larger than many national parks. The 2026 report lists 1,090 burros there against a high AML of 98, generating a*

*headline figure of **1,112% over AML**. Read that carefully: BLM asserts that 178,564 acres of Nevada desert — terrain that demonstrably sustained a burro population that grew to 1,090 animals — **can only support 98**. The landscape that produced 1,090 burros is somehow declared incapable of sustaining a viable population at any level over 98 individuals; not 150, not 500, only 98. That is not an ecological finding. It is an AML set decades ago, likely weighted toward grass-based forage analysis that excludes the mesquite, shrubs, and forbs that constitute the majority of burro diet in desert Southwest ecosystems. The 1,112% figure is not evidence of a burro crisis on those 178,564 acres — it is evidence of the gap between a politically-set carrying capacity number and actual burro ecology*

Compounding this, **BLM has never defined herd-specific burro foaling seasons**. For horses, BLM at least acknowledges a foaling prohibition window — however imprecisely defined. For burros, BLM's official position is that they "do not exhibit a specific foaling season," a policy assertion that Wild Horse Education's monitoring data directly contradicts. Burro foaling is clustered in milder months when forage and temperatures support lactation, even if the window is broader than for horses. Because BLM has never collected or analyzed burro-specific foaling data at individual HMAs, it cannot accurately project burro population growth, cannot correctly time gathers to minimize foal mortality, and cannot design fertility control programs calibrated to burro reproductive biology. BLM is also ignoring its own mortality data: post-capture death rates for burros can run as high as **24%** — far exceeding horse mortality — yet this documented attrition is not incorporated into population modeling or used to question the growth-rate assumptions that drive removal planning.

With that methodological backdrop, the burro figures in the 2026 report must be read with particular skepticism as a representation of any "crisis" that requires an allocation of funding from Congress.

The HMAP Crisis: Court-Ordered and Still Evaded

When Wild Horse Education published its 2022 review, BLM was actively and openly insisting it did not need to prepare Herd Management Area Plans (HMAPs) at all. This was not a bureaucratic oversight or a resourcing failure — it was an explicit agency position even though the HMAP was the only wild horse and burro management document explicitly noted in the Code of Federal Regulations (CFR).

At the same time, BLM's own 2020 Report to Congress, used the HMAP to unlock hundreds of millions in new appropriations, described the HMAP as the **"foundational management document"** for the program — calling it "a key component in the decision-making process for BLM's wild horse and burro management activities on the ground" and even requesting $1 million annually for HMAP creation and revision. Congress funded that request, repeatedly, beginning with the Consolidated Appropriations Act of 2020 and in every subsequent appropriations cycle through 2025.

In practice, BLM used the funding almost exclusively to accelerate removals — and began no new HMAP scoping processes for the hundreds of HMAs that had never had one.

The few HMAPs that technically exist are largely artifacts of the late 1980s. The BLM completed 5 HMAPs in FY1986 and 8 more in FY1987.

Of 83 HMAs currently managed in Nevada, **58 have never had an HMAP**. Nationally, of the 175 HMAs now listed in the 2026 report, the overwhelming majority are operating under gather Environmental Assessments that use the word "management" in their titles but do not disclose how AML was set, do not address forage allocation between livestock and wild horses, do not analyze genetics or genetic viability, and do not provide the public with the administrative review process the HMAP is specifically designed to enable.

BLM's position that roundup plans and resource management plans together satisfied the HMAP requirement — a position it asserted for decades — was **rejected by federal court in March 2024**. In *Leigh v. United States Department of the Interior*, No. 3:22-cv-00034-MMD-CLB (D. Nev. Mar. 28, 2024), U.S. District Judge Miranda Du ruled that "BLM must be compelled to prepare a herd management area plan (HMAP)" for the Pancake Complex in central Nevada, finding that the agency's "decades-long delays in developing and approving HMAPs have therefore been 'nothing short of egregious' and clearly violate the rule of reason". The court explicitly rejected the argument that individual gather plans substitute for an HMAP, writing that "engaging in the decision-making of an HMAP without actually preparing an HMAP could therefore deprive interested parties of the administrative review processes to which they are entitled". Judge Du ordered BLM to complete the Pancake Complex HMAP by March 24, 2025 and remanded the Pancake Gather EA back for further analysis including wildfire risk. A second ruling by the same court in September 2024, in the Blue Wing Complex case, reinforced the same precedent: a gather plan is not a management plan, and the failure to prepare HMAPs applies to "every single HMA where BLM never crafted an HMAP".

BLM's response to this judicial rebuke has been to side-step. Rather than initiating genuine HMAP scoping processes that would require disclosing AML methodology, conducting public participation on forage allocation, addressing genetic viability, and analyzing the impact of livestock grazing within HMA boundaries, BLM has instead begun **repackaging existing gather Environmental Assessments as HMAPs** — relabeling documents that omit the legally required content, do not disclose how AML was set, and do not provide the public with meaningful opportunity to address management goals beyond removal targets.

A removal plan is not a management plan. The court said so explicitly. But as of the 2026 reporting cycle, BLM continues to move forward with gather operations at HMAs where no legally compliant HMAP exists — and the 2026 population statistics report itself contains no reference to HMAP status for any of the 175 HMAs it covers.

We are back in court on this very issue for several herds, right now.

The HMAP is the only planning document for wild horses and burros specifically codified in the Code of Federal Regulations (43 CFR 4710.4). It is the sole vehicle through which the public can engage on AML methodology, forage allocation, range improvements, genetic management, and the triggers that define what "excess" actually means at a specific HMA. Without it, every removal operation is built on an AML whose derivation has never been publicly disclosed, defended, or subjected to NEPA analysis — and the 2026 population statistics report, presenting 334% overage figures against those same undisclosed AMLs, perpetuates that structure intact.

The 2022 report made a central finding: **not a single Scoping process had begun to create an HMAP where none existed**, despite Congress appropriating funds specifically for HMAP development since 2020. The 2026 population statistics report contains no evidence that this has changed.

Without HMAPs, the agency has no framework to:

- Define ecologically-appropriate population targets beyond politically-set AML
- Establish triggers for removal that are tied to habitat monitoring data
- Address range improvements, water development, or habitat protections for the herd
- Provide any foundation for legal defensibility of decisions

The consequence is what our 2022 report called a "remove and stockpile" cycle with no endpoint. The 2026 data bears this out: the BLM removed 7,853 animals from the range in FY2025, yet the reported on-range total jumped by more than 12,300 animals in a single year. The agency is removing animals faster than at almost any point in program history while simultaneously reporting a larger on-range population — exactly the pattern the NAS identified in 2013 when it found that "management practices are facilitating high horse population growth rates" and that "the number of animals processed through holding facilities is probably increased by management."

Without actual disclosure and scrutiny of how AML is set (through a real HMAP process) every assertion of "overpopulation" is based on politics, not facts. The entire Population Statistics report is a very expensive set of numbers based on manipulation, not data or science or even simply "full public participation."

The Political and Fiscal Crisis Surrounding the 2026 Report

The 2026 population report lands in an extraordinarily precarious political environment for wild horses and burros. The Trump administration's FY2026 budget proposed a 25% cut to the BLM Wild Horse and Burro Program and sought to **eliminate the longstanding prohibition on killing outright or slaughtering** federally protected wild

horses and burros. This proposal was previewed in the Project 2025 *Mandate for Leadership* document, which explicitly calls on Congress to enact laws permitting BLM to "dispose humanely" of wild horses and burros.

The White House proposed budget for FY2027 has not been released yet falling way behind legal deadlines.

In this environment, a population report that asserts 85,466 animals on the range — 334% of the un-scientific AML — becomes **a tool for arguing that the only solution is mass lethal removal.**

This is precisely why the structural critique of how these numbers are generated, what AML actually means, and whether HMAPs exist to justify those numbers is not a technical footnote.

It is the central question the BLM Population Statistics report fails to answer.

PLEASE stop calling the Wild Horse and Burro Program an Expensive Burden

The Cost Myth: Wild Horses vs. Livestock Subsidies

Livestock industry lobbyists, appropriators on key committees, and even some national media repeat a simple talking point: the wild horse and burro program is "too expensive" and "unsustainable."

The numbers do not support that claim. When set against the true public cost of subsidizing private livestock on the same public lands, the wild horse and burro program — even in its current, structurally broken, remove-and-stockpile form — is a fiscal rounding error.

The **federal livestock grazing program** is where the real money is. Taxpayers for Common Sense, drawing on GAO and agency data, calculates a **minimum net loss of 123 million dollars annually** on public lands grazing: BLM and the Forest Service spend at least **144 million dollars per year** administering private livestock grazing on federal lands and collect only **21 million dollars in grazing fees** in return. The federal grazing fee of **$1.69 dollars per AUM (finally raised from $1.35 effective March 1, 2026)** is a tiny fraction of the 2024 private market average of **23.40 dollars per AUM** — a more than **90% subsidy** on the forage ranchers use to raise cattle and sheep for private profit. When indirect costs — rangeland restoration, weed control, riparian repair, water quality impacts, road maintenance, and lost recreational and wildlife values — are included, independent analyses estimate the **true annual cost of the federal grazing program at 500 million to 1 billion dollars**.

Those subsidies are highly concentrated. Fewer than 21,000 federal grazing permittees — representing roughly **3% of U.S. beef producers** — receive the benefit of this multi-hundred-million-dollar annual subsidy. The average public-lands rancher receives

an estimated **23,809 dollars per year** in taxpayer support through below-market grazing fees alone. A 2025 joint investigation by High Country News and ProPublica confirmed that the largest share of public-lands grazing permits, and therefore of the subsidy, is held by some of the wealthiest ranchers and corporate entities in the West.

Layered on top of this is **USDA Wildlife Services**, the federal program that kills predators and other wildlife largely to protect those same subsidized livestock. Wildlife Services operates on an annual budget of roughly **149 to 287 million dollars**. In 2024 alone the agency killed nearly **2 million animals** — an increase of 474,000 over 2023 — including 68,649 coyotes, 305 wolves, 237 mountain lions, 437 black bears, 482 bobcats, and 6 federally protected grizzly bears. Over the past decade, Wildlife Services has killed more than **22 million wild animals**, most of them to benefit private livestock operations using public land at 1.35 dollars per AUM. Former Wildlife Services specialist Carter Niemeyer summarized the agency's mission bluntly: **"We were the hired gun of the livestock industry."**

Beyond direct subsidies and predator killing, ranchers grazing on public lands also draw from **federally funded indemnity and disaster programs**. Under the Livestock Indemnity Program and related disaster aid, ranchers can receive **75% of market value** for animals lost to severe weather and higher rates for predator-caused losses in areas where Wildlife Services is deployed. They may also receive federal funding for rangeland restoration and water developments through the Natural Resources Conservation Service, even as those developments further entrench livestock use on public lands.

In practical terms, a single operation can graze cattle at 1.69 dollars per AUM, receive taxpayer-funded predator removal, be compensated for drought or storm losses, and receive cost-shared infrastructure — all while its livestock compete for forage with wild horses and burros that are portrayed as the fiscal problem. No other industry props up individual private operators so heavily.

Set against this landscape, the wild horse and burro program's **approximately 155 million dollar annual budget** is, in fiscal terms, comparatively small. The program's costs are real and growing, but they are growing because the agency chose the most expensive possible management strategy: remove animals en masse to low AML without HMAPs, warehouse them for life, and refuse to revisit AML or livestock allocations. The same livestock interests that benefit from hundreds of millions of dollars per year in direct and indirect subsidies now point to the consequences of their own policy demands — ballooning holding costs — as justification to cut the wild horse and burro budget and strip away the slaughter prohibition.

The myth that the wild horse and burro program is "overly expensive" collapses the moment it is placed in context.

The real fiscal story of public lands in the West is not that wild horses cost too much. It is that the American taxpayer is **underwriting an enormous, multi-agency subsidy for private livestock** — federal grazing, predator killing, indemnity payments, drought relief, and infrastructure — and then **being told that the relatively small wild horse and burro line item is the crisis that demands cuts and lethal solutions.**

What the 2026 Report Does Not Tell Us

The BLM's annual statistics report is a data table. It lists HMAs, estimated populations, AML ranges, acreage, survey dates, and gather dates.

It does not address:

- **Whether the AML for any given HMA was set based on current, scientifically defensible data** — or whether it reflects the political pressures of the 1980s and 1990s when most AMLs were established
- **Whether any HMA has an HMAP that defines management goals, monitoring triggers, and habitat objectives** — the document that, per 43 CFR § 4710.4, is required to guide management decisions
- **Whether population survey figures are derived from current direct counts or from multi-year extrapolations** using contested growth rate assumptions
- **How livestock AUMs allocated on the same HMA acreage** compare with wild horse and burro AUMs — the fundamental allocation question the agency continues to avoid

Findings and Ongoing Concerns

The 2026 BLM Wild Horse and Burro Population Estimates report demonstrates that the structural failures documented in the 2022 Wild Horse Education review remain entirely intact. The following findings parallel those of 2022 — updated to reflect current data:

1. AML remains scientifically unjustified. The national high AML of 25,592 has barely changed from the 26,715 cited in the 2020 Plan — itself based on politically-set levels largely unchanged since the 1980s. No systematic, scientifically-rigorous AML revision process has been completed.

2. HMAP planning remains a fiction. The 2026 report provides no evidence that HMAPs have been completed for the dozens of HMAs that have never had one. The 2022 report documented that Congress appropriated funds for HMAP development

beginning in 2020. Since the court ruling BLM has simply provided new “gather plans” and changed the name. We are back in litigation again because instead of going what is correct, BLM digs in their heels to maintain “the way it has always been done” creating a significant financial burden for the public.

3. Zero-AML HMAs continue to corrupt national statistics. Multiple HMAs with a politically-assigned AML of zero (or near-zero) generate headline percentage figures — 2,100%, 14,400%, 15,500% over AML — that have no scientific basis and distort the presentation of the national overpopulation claim.

4. Population survey data is inconsistent and partially outdated. Survey dates for individual HMAs in the 2026 report range from 2025 to 2006, with some estimates still based on "prior year's reported population" extrapolations rather than direct counts.

5. The remove-and-stockpile model is accelerating program collapse. Increasing removals increase holding costs. There has been no change to this model in decades. Unless underlying on-range management flaws are addressed, the program will collapse on itself with funneling more horses and burros into a rapid “Sale” is the only pressure release.

6. The burro crisis in Arizona and Nevada demands immediate attention. Arizona's burro population and Nevada's extreme outliers represent a welfare and management emergency that cannot be addressed through the current planning vacuum based on severely flawed methodology.

7. The threat of slaughter as a "solution" must be vigorously opposed. Wealthy lobbyists and bought and paid for politicians continue to push an “overly burdensome” fiscal narrative that simply does not hold up. This is being done to satisfy politics, not science or the law.

Conclusion

Taken together, the 2026 Population Estimates do not describe a biological crisis caused by wild horses and burros; they document an ongoing management crisis inside the BLM.

The BLM 2026 Population Statistics Report is simply an inaccurate, misleading and dangerous tool pushing a political narrative, not a science-based one.

The agency continues to anchor all decisions to politically-set AMLs that were never grounded in transparent, site-specific science, to operate without legally compliant HMAPs for most herds, and to rely on inconsistent, sometimes decades-old population data to justify ever-escalating removals. The result is a remove-and-stockpile pipeline that is driving program costs upward, pushing unique herds like Carter Reservoir toward functional extinction, and feeding a rapidly expanding Sale Authority channel that delivers federally protected animals into the slaughter system under the guise of "placement."

At the same time, the wild horse and burro budget is framed as an intolerable burden while far larger, less scrutinized subsidies flow every year to the livestock interests whose demands shape this program.

A lawful, humane, and fiscally responsible "path" is still available — but it requires Congress and the public to stop accepting "overpopulation" at face value and to insist on what the law has required since 1971: honest data, real management planning, and data-based on-range solutions that keep wild horses and burros on their lands, not in holding pens or kill pens.