



## 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*

June 19, 2018

Brian Steed  
Acting Director,  
Bureau of Land Management  
Department of Interior  
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Washington, DC 20240

Mr. Steed;

The National Horse & Burro Rangeland Management Coalition includes a wide range of sportsmen, livestock, wildlife, and land conservation organizations and professional societies. Collectively, we represent more than 10 million Americans and 6,000 local governments, focusing on commonsense, ecologically-sound approaches to managing horses and burros to promote healthy wildlife and rangelands for future generations.

We are pleased that the Bureau of Land Management (BLM) has delivered the report that Congress explicitly requested in the joint explanatory statement accompanying the Consolidated Appropriations Act of 2017. Chairman Ken Calvert (R-CA) reminded the BLM of the Congressional directive in the Fiscal Year 2018 appropriations report language for the Department of the Interior, Environment and Related Agencies:

*“The Committee reminds the Bureau of the directive included in the joint explanatory statement accompanying the Consolidated Appropriations Act, 2017, to provide a comprehensive plan to Congress to address the excess numbers of wild horses and burros and the unsustainable, rising costs of the Wild Horse and Burro program. The Committee encourages the Bureau to include in the plan: increased adoptions; additional research on equine contraceptives; opportunities for private citizens and organizations to support wild horses and burros; rangeland restoration; reductions in herd sizes on the range; and options for reducing the number of animals in long-term holding facilities.”*

The content of this report illustrates BLM’s commitment to the ultimate goal of healthy horses on healthy rangelands and provides Congress with the information needed to make decisions related to the agency’s

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funding levels and directives. The report clearly and concisely highlights the detrimental effects excess wild horses and burros have on our nation's public rangelands and the challenges in effectively managing their populations. The report includes four scenarios, each of which provides a suite of tools that will improve management outcomes with the aim of achieving Appropriate Management Levels within a defined timeframe - to help sustain healthier herds on healthier rangelands. We encourage Congress to move swiftly in its debate over these options and the identified challenges, and to work with the BLM and stakeholders to direct and implement increased management actions to ensure horse and burro and rangeland health.

However, questions remain as to how the agency will carry out these options. The Coalition and its members specifically request answers to the following questions on BLM's report to Congress titled, *Management Options for a Sustainable Wild Horse and Burro Program*:

1. Have state wildlife agencies been consulted in the development of any of these options? The *Wild and Free-Roaming Horse and Burro Act of 1971 (WFRHBA)* requires consultation with state wildlife managers in carrying out wild horse and burro management activities. State wildlife agencies have a vested interest in wild horse and burro management given their efforts to sustain native wildlife through science-based management and conservation activities.
2. Has the Advisory board been consulted? The Advisory Board was established in the WFRHBA to advise the Secretary of the Interior and the Secretary of Agriculture on wild horse and burro management activities. The Board serves to represent a wide array of public interest and stakeholder groups, and has special expertise and insights in wild horse and burro management concerns.
3. What assumptions were made in your calculations of wild horse and burro population growth and the effect of various management actions? Many of the options outlined in the report require the gather and removal of a large number of animals. The outcomes provided must be based on several assumptions, including those of 1) anticipated population growth rates, 2) the physical ability of the agency to gather animals, 3) the effect of gathers and removals on population growth rates, 4) the effect of gathers and removals on-range mortality rates, 5) the age structure of the on-range populations, 6) the number of animals that need to be treated with sterilization and/or fertility control each year, and 7) the expected effectiveness of fertility control efforts.
4. Assumptions are also being made about current and future range conditions. Based on these options, it seems BLM is assuming the AML will remain relatively constant over the next 6-12 years. In light of that assumption, what risk assessments were made in regards to degrading range

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conditions, including seasonal and long-term drought conditions? Given the 6- to 12-year time frames these options provide to getting numbers down to the upper AML, what considerations have been given to the amount of money it will take to rehabilitate the additional land they will have decimated within that time frame? Have those costs been compared to the cost of actively managing the horses and removing them on a timelier basis?

5. In many of the options outlined, the phrase “find enough trained veterinarians” is indicated as a factor for success. Specifically, how many veterinarians would be needed for each option to be successful? Has BLM discussed these options with veterinarians that have practical experience in spaying mares in the field? BLM had indicated last fall that 15,000 animals per year would be the maximum number they could gather and remove. What has changed within BLM to believe they could gather as many as 18,000 animals per year?
6. All of these plans could potentially span multiple administrations, making consistency in implementation crucial for success. How would continuity in plan implementation be ensured, regardless of which option is selected?
7. In the report, Attachment 2, “FY2017 cost estimates”, does not provide a cost estimate for unrestricted sale. How did the financial aspects of unrestricted sale (the costs of conducting the sales and the revenue generated from those sales) factor into the development of options?
8. What consideration has been given to the current severe drought on many of the HMAs and the eminent water crisis in which BLM may be put into a position of needing to remove thousands of horses in order to prevent inhumane conditions?

Additional details, including answers to these questions regarding the potential implementation of the four scenarios and their on-the-ground impacts, would help the Coalition and other stakeholders gain a better understanding of how the BLM arrived at these options, and which is the most viable management solution. Your timely response is respectfully requested.

For questions, please reach out to the Lia Biondo, Coalition Vice Chair at (202) 870-1552.

Sincerely,

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Ethan Lane  
Coalition Chair  
Public Lands Council

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Lia Biondo  
Coalition Vice-Chair  
Society for Range Management

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CC: Deputy Director, Policy and Programs, Brian Steed  
Deputy Director of Operations, Mike Nedd  
BLM Oregon-Washington State Director Jamie Connell  
Division Chief, Wild Horses & Burros

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