



## 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*

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DATE: 3 February 2016

TO: Lisa Grant, Bureau of Land Management, Burns District Office  
28910 Hwy 20 West, Hines, OR 97738  
blm\_or\_bu\_maresearchea@blm.gov

RE: Comments of the National Horse & Burro Rangeland Management Coalition on  
EA – Mare Sterilization Research – DOI-BLM-OR-B000-2015-0055-EA

FROM: National Horse & Burro Rangeland Management Coalition  
Keith Norris, Chair, [keith.norris@wildlife.org](mailto:keith.norris@wildlife.org), 301-897-9770 x309

Ms. Lisa Grant,

The National Horse and Burro Rangeland Management Coalition supports the Bureau of Land Management's efforts to comply with the Wild Free-Roaming Horse and Burro Act of 1971 (Act) by managing for healthy herds on healthy ranges. Sterilization of free-roaming horses and burros is a potentially viable management activity authorized by the Act, but only if it can be scientifically evaluated and proven to be effective and viable.

Our Coalition includes a wide range of sportsmen, livestock, wildlife, and conservation organizations and professional societies. Collectively, we represent over eight million Americans and focus on commonsense, ecologically-sound approaches to managing horses and burros to promote healthy wildlife and rangelands for future generations.

The Coalition recognizes that unmanaged horses and burros negatively impact the health of rangeland ecosystems. Horses and burros are known to compact soils and graze vegetation extremely low to the ground, reducing the ability of plants to re-grow. Additionally, horses and burros compete with native wildlife for food and water resources and impact habitat used by these species. Excessive numbers of these animals can lead to starving and dehydrated horses and burros. Excess horses and burros are not compatible with a thriving natural ecological balance, which is required by the Act.

Wild horse and burro populations are currently doubling every 4 years, off-range holding facilities are near capacity, and a continued decrease in off-range horse adoptions (2,631 horses in FY15) plague the BLM's Wild Horse & Burro Program. Additional management practices are needed to allow the program to be successful.

The three proposed studies provide the opportunity to research alternative fertility control methods beyond the use of PZP, which has been found to lose its effectiveness after one year. If any or all of the ovariectomies, tubal ligations, or hysteroscopically-guided laser ablations are found to be effective long-term sterilization techniques, the Coalition encourages the BLM to

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American Farm Bureau Federation • American Sheep Industry Association • Masters of Foxhounds Association • Mule Deer Foundation  
National Association of Conservation Districts National Cattlemen's Beef Association • National Rifle Association  
National Wildlife Refuge Association • Public Lands Council • Public Lands Foundation • Rocky Mountain Elk Foundation  
Safari Club International • Society for Range Management • The Wildlife Society



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employ the effective treatments as soon as possible. The Coalition suggests that the BLM incorporate the substantial amount of scientific research and publications that already exist on the sterilization of domestic mares to increase the robustness and efficiency of their own research program. Swift implementation of effective population growth suppressing methods is necessary to protect our nation's rangelands from further degradation caused by increasing horse and burro populations.

We encourage the BLM to proceed with the implementation of these studies. While we are convinced they may ultimately prove helpful to supporting rangeland health, native wildlife, and healthy horse population consistent with the Act, we ask that the results of these studies be recognized as a small component of a greater, all-inclusive and active management approach to the issue of wild horse and burro populations.

Thank you for your efforts to manage horses in a manner that will restore and maintain a thriving natural ecological balance between horses, native wildlife, and multiple uses of the range.

Sincerely,

Keith Norris, AWB®  
Coalition Chair

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