

Wildlife and Hunting Heritage Conservation Council

November 4, 2015

The Honorable Sally Jewell
Secretary of the Interior
1849 C Street NW
Washington D.C. 20240

Dear Secretary Jewell:

With intensifying demands on public lands for energy production, livestock forage, wildlife habitat, diverse recreation, mining, and other uses - and limited federal resources - it is imperative that we take action as a nation to steward these public assets with utmost diligence. In this light, the members of the Wildlife and Hunting Heritage Conservation Council ask that you help resolve the long-standing problems created by an overpopulation of wild and feral horses, which are degrading federal lands and impacting other interests of your constituents. These circumstances are rendered more acute, due to long-term, intensifying and interrelated cycles of drought, fire, and invasive plant population expansions - all of which are threatening already imperiled wildlife species.

The current management of horses on federal lands and associated private and tribal lands simply is not compatible with wildlife conservation or sound stewardship of important national assets. Further, the current approach is wasting tens of millions of tax dollars annually. Federal Fiscal Year 2014 expenditures for the wild and feral horse and burro program totaled nearly \$70 million, more than \$45 million of which was spent to maintain horses on private land long-term holding facilities. We understand, in fact, that each wild and feral horse that is transferred from federal lands to a private land long-term holding facility costs U.S. taxpayers more than \$46,000. In addition, the life expectancy of the horses living on private lands increases by several years, which in turn increases the taxpayer cost for the maintenance of each horse.

While we applaud current efforts by the departments to utilize U.S. Geological Survey studies to improve available management science, a carryover budget rider precludes the Bureau of Land Management (BLM) from effective management solutions. We urge you to seek removal of these prohibitions, in order to afford your agencies the ability to quickly reduce the number of wild and feral horses under federal care.

At present, the number of wild and feral horses on lands managed by the BLM, U.S. Forest Service, U.S. Fish and Wildlife Service, National Park Service, and Department of Defense far exceeds carrying capacity estimates established by credible expertise and science. Many BLM and Forest Service lands in the west, in particular, are severely impacted. The carrying capacity of these lands – the number of horses that can be sustained while maintaining healthy animals and ecosystems – is estimated at 26,500; and even this number is considered by many experts to be well in excess of the actual carrying capacity, which is now further diminished by long-

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term drought and widespread fire in the West. In contrast, recent estimates place the number of wild and feral horses on federal lands at nearly 60,000 (and likely in excess of 100,000, or more than four times carrying capacity) with another 47,000 horses being held in private land long-term holding facilities.

The unchecked overpopulation of wild and feral horses is having staggering consequences. For example, the habitats of other wildlife are being severely impacted (contributing to the decline of sensitive species such as sage grouse and prairie chickens). Horses radically alter plant communities and associated hydrologic regimes and deprive other species of access to water and cover. In addition, surface waters are impaired, public recreational opportunities are diminished, scenic vistas are spoiled, livestock forage is degraded, and significant federal tax dollars needed for wildlife and habitat management and restoration are being wasted.

While we recognize that wild and feral horses have been given some federal statutory protections and that many consider these animals as important national heritage icons neither of these factors should hinder the reasoned and scientifically based management of these populations. Nothing in law or culture dictates that sound biological principles should be abandoned in the management of wild and feral horses, or that wild and feral horses should be managed to the detriment of other wildlife species. In fact, the Wild and Free Roaming Horses and Burros Act requires that “[t]he Secretary shall manage wild free-roaming horses and burros in a manner that is designed to achieve and maintain a thriving natural ecological balance on the public lands.”

It is critical that these animals be managed responsibly, like any other natural resource. The current approach simply has been unsuccessful, and has prolonged the negative trends of the wild and feral horse program - fiscally, environmentally, and administratively. Adoption, sterilization, and other efforts to reduce the number of wild and feral horses on federal and private lands have uniformly failed.

We ask, therefore, that you earnestly seek removal of the prohibition that precludes effective management of wild and feral horse populations (contained in the Department of Interior appropriations bill) and replace it with permanent authority for involved federal agencies to:

- Avoid any obligation to manage each federal land unit having a wild and feral horse population independently, allowing the agencies discretion to manage, as needed, the herds as a single population with a common genetic pool.
- Utilize a transparent, best-science approach to reviewing, establishing, and achieving carrying capacities for wild and feral horses on federal lands, while ensuring that drought, fire, and invasive plant populations are fully considered in this process.
- Make every effort to reduce the wild and feral horse populations to carrying capacity within 10 years or less, and maintain that level.
- Eliminate the need for long-term holding facilities and then close all such facilities within 10 years; in the meantime, conduct careful environmental analysis of each facility and establish conservative stocking rates.
- Require the use of all appropriate management strategies, including advanced sterilization and humane euthanasia techniques, as deemed necessary by appropriate range management and equine experts.

We thank you for your attention to this important issue, and we are available to provide information and support in this regard.

Sincerely,

A handwritten signature in black ink that reads "John Tomke". The signature is written in a cursive, flowing style.

John Tomke, Chair
Wildlife and Hunting Heritage Conservation Council

Cc:
Secretary Tom Vilsack, USDA
Under Secretary Robert Bonnie, USDA
Chief Tom Tidwell, U.S. Forest Service
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Director Dan Ashe, U.S. Fish and Wildlife Service
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