March 6, 2014

The Honorable Mary Landrieu  The Honorable Lisa Murkowski
Chair  Ranking Member
Committee on Energy and Natural Resources  Committee on Energy and Natural Resources
U.S. Senate  U.S. Senate
Washington, D.C. 20510  Washington, D.C. 20510

The Honorable Doc Hastings  The Honorable Peter DeFazio
Chairman  Ranking Member
Committee on Natural Resources  Committee on Natural Resources
U.S. House of Representatives  U.S. House of Representatives
Washington, D.C. 20515  Washington, D.C. 20515

Re: Need for Congressional support of Wild Horse & Burro Program, Bureau of Land Management

Dear Chairwoman Landrieu, Ranking Member Murkowski, Chairman Hastings and Ranking Member DeFazio:

In a recently released internal working document (attached) for the Bureau of Land Management’s Wild Horse & Burro Program, Division Chief Joan Guilfoyle described the current state of the program as “nearing the point of financial insolvency.” She specifically cited challenges resulting from a growing population of horse and burros on the range, increasing program costs, declining adoptions and holding pasture space, and declining appropriations. Although Ms. Guilfoyle may have intended this memorandum to be an internal, working document, it nonetheless points out some very troubling and accurate aspects of the program.

The National Horse & Burro Rangeland Management Coalition agrees with Ms. Guilfoyle’s assessment of the program. However, we are deeply concerned with the prioritization of actions Ms. Guilfoyle has outlined in her memo, including the decision to halt the removal of horses and burros from rangelands.

Historically, financial and policy constraints, and the sometimes lack of science-based management of horse and burro populations, have led to herd overpopulation, resulting in negative impacts to the surrounding habitat, including native plant and wildlife species. Therefore, we do not support the decision to halt altogether the removal of horses and burros from the range. This decision not only violates the Wild Free-Roaming Horses and Burros Act requiring the removal of excess horses, but, also places millions of acres of rangelands at risk to further degradation. Horses and burros are non-native species that stress natural vegetation communities through overgrazing, competing with native wildlife for scarce resources, and causing soil compaction. All of these impacts adversely affect crucial habitat
areas, such as 9.9 million acres of Greater Sage Grouse habitat, a candidate for Endangered Species listing.

On the range, horse and burro populations increase by approximately 20% annually. Without removal by the BLM, these populations will not receive proper management and will continue to grow. Eventually, if it is not already occurring, each population will adversely affect the range and the horses themselves. Further, expanding populations encroach on property interests on public and private lands and expansion on to private and state properties outside available Herd Management Areas violate BLM’s statutory authority. The existing fertility control methods have proven to be ineffective at restraining the population under existing management protocols.

Based on the many issues surrounding the BLM’s Horse & Burro Program, we call upon the Committees to engage in and support necessary actions to ensure the goals of the program are sustained. A sustainable program must:

- **Fulfill BLM’s mission** “to sustain the health, diversity, and productivity of America’s public lands for the use and enjoyment of present and future generations”\(^1\), and
- **Comply with the Wild Horse and Burro Act:** “The Secretary is authorized and directed to protect and manage wild free-roaming horses and burros as components of the public lands... ‘The 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.” 16 U.S.C. § 1333(a)

We believe the BLM can address the welfare concerns of horses and burros while ensuring our nation’s rangelands are healthy and capable of supporting native wildlife populations and ecosystems. The Coalition would appreciate the opportunity to meet with you and your staff to discuss possible long-term solutions to this contentious issue. For further information regarding the Coalition, please contact ted-ramsey@nacdnet.org.

Sincerely,

American Farm Bureau Federation  
Association of Fish and Wildlife Agencies  
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

**Attachments:** *Internal Memo from Chief Joan Guilfoyle, Coalition Policy Statement*

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\(^1\) U.S. Department of Interior. *Bureau of Land Management: Who We Are, What We Do.*