

Congress of the United States
Washington, DC 20515

The Honorable Kenneth L. Salazar
Secretary of the Interior
U.S. Department of the Interior
1849 C Street NW
Washington, DC 20240

July 28, 2011

Dear Secretary Salazar,

In recent months the Bureau of Land Management (BLM) has unveiled detrimental new policies in regards to the management of America's wild horses and burros. Recently selected as the management tool for the White Mountain and Little Colorado herds in southern Wyoming, the most disconcerting of these is the decision to create non-reproducing herds on legally designated wild horse and burro herd areas.

Since the designated Proposed Action in the Environmental Assessment is different than the chosen alternative in the Decision Record, such action could be in violation of the National Environmental Policy Act, which requires full justification of any change to the chosen alternative and a public comment period. On June 21, 2011, BLM Rock Springs Field Office issued a public letter noting they were "re-evaluating certain aspects of its Decision Record related to spaying gathered mares", and issued a modified Decision Record for gathering wild horses. This modified Decision Record returns only gelded wild horses to the herd management areas, and does not include spaying.

To accomplish the goal of creating a non-reproducing herd, the BLM proposes to geld stallions and also spay wild horse mares. Both procedures are dangerous for wild animals, but the spaying of female horses is a practice not even recommended for domestic mares, let alone wild ones. Immunocontraception is a much safer, more humane, and less costly method of fertility control, which has already proven to reduce population growth rates, and can reduce the need and frequency of removals, and ultimately, result in long-term reductions in off-the-range management costs.

Only one field example of spaying of wild mares exists. This spaying took place at the Sheldon National Wildlife Refuge in Nevada. At least, ten percent (30 horses) of the mares died. The Sheldon operation was conducted on a much smaller scale than what is currently under consideration by BLM. It is also possible that the recorded number of deaths at Sheldon is far below the actual number of deaths- some mares were released to the wild and not tracked to determine if more deaths occurred. The potential risk to the affected herds is troubling. Even the United States Department of Agriculture (USDA) Animal and Plant Health Inspection Service

(APHIS) veterinarian, Dr. Al Kane, expressed concerns about the procedure. In fact, the majority of equine and large animal veterinarians strongly discourage the practice, particularly with wild animals. The surgical environment needs to be completely sterile and recovery time takes at least a month, neither of which is something BLM has the capacity to undertake. At Sheldon the wild horses were hoisted into front loaders of tractors where the procedures were performed.

Although sterilization is mentioned in the Free-Roaming Wild Horse and Burro Act, it is intended to reference population control, and not the creation of completely non-reproducing herds, which would result in the extinction of wild horses in their legal herd areas. Natural controls on population levels are cited within the same sentence of the Act, a concept that your agency has not taken into serious consideration. Predator management through mountain lions has been enormously successful in stabilizing the population of the Montgomery Pass herd on the California-Nevada border. Due to predation of foals by mountain lions, that herd has not had a roundup in almost 30 years. The same is true for the Cerbat wild horses of Arizona who have shown a stable population in an ecosystem with natural wildlife predation.

BLM has a documented history of inhumane treatment of wild horses and burros during roundups. This inhumane treatment comes at an enormous price to the animals, but also to American taxpayers. Short-term and long-term holding of wild horses and burros cost the taxpayer \$36.9 million in fiscal year 2010. With the continuation of roundups this summer, that cost will certainly escalate.

We are also concerned that BLM has consistently failed to round up its target number of wild horses. There are numerous examples of actual herd numbers ending up to be far fewer than stated in the BLM Environmental Assessments. For example, a roundup this winter in the Antelope Complex of northeastern Nevada resulted in the removal of 1,398 wild horses. BLM maintained that there were 2,705 horses on the range and intended to remove between 1,867-2,228 of those horses. If BLM estimates of herd size are consistently more than actual herd size, then the stated overpopulation problem could be much more manageable than presented by BLM and require far fewer roundups. This discrepancy demonstrates the need for the execution of more accurate censuses.

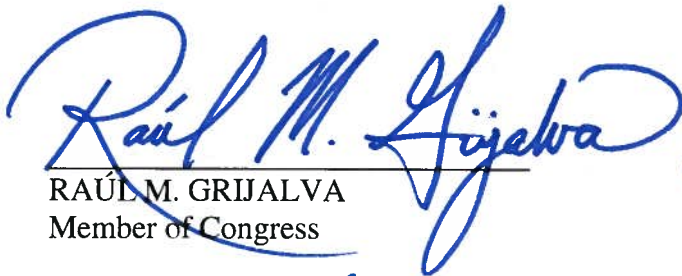
Given the current methods employed, we have serious doubts about BLM's ability to provide an accurate census of the wild horse and burros. Despite pressure from outside groups for a state-of-the-art multispectral camera census using unmanned aircraft- currently in use by Homeland Security, NASA, and the Department of Defense- it appears no real effort has been made to explore this option. The potential for partnership with other Federal Agencies with access to this technology exists. A partnership between NASA and the US Forest Service has resulted in the use of the unmanned aircraft to spot forest fires. Customs and Border Protection has unmanned aircraft at our Northern and Southern Borders that could be engaged for accurate wildlife census in the Western states.

We are also concerned about BLM's overall commitment to herd conservation and stewardship. BLM budget allocation to census operations and actual on the ground range monitoring was a paltry \$1 million last year, while roundup operations alone constituted over \$7.7 million. It appears that BLM is focusing their efforts on eradication of wild horses and burros, rather than

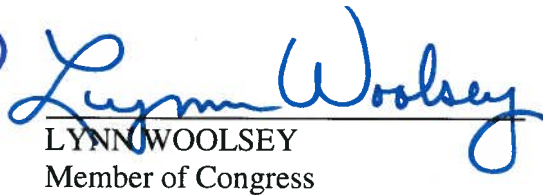
actual management and monitoring on the range. The wild horses and burros of the American west deserve the treatment afforded to them by the Wild Horses and Burros Act.

Please take our concerns into account when evaluating the relevant BLM programs and help rectify the discrepancy between the horse conservation and the in-the-field practices of BLM. We ask that BLM not engage in the drastic, inhumane practice of spaying and gelding wild horses to create non-producing herds in protected areas. We also ask that BLM cease all roundups pending the results of the National Academy of Sciences (NAS) review of BLM's Wild Horse and Burro Program.

Sincerely,



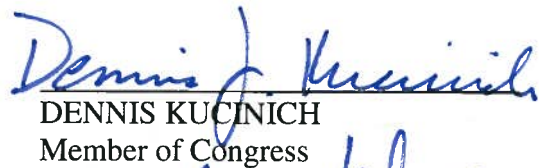
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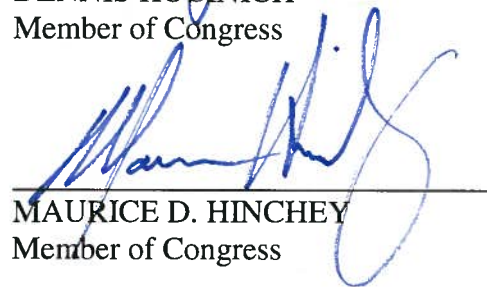
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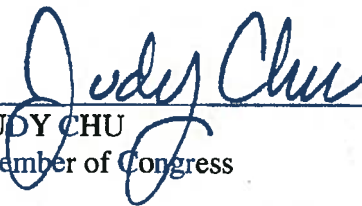
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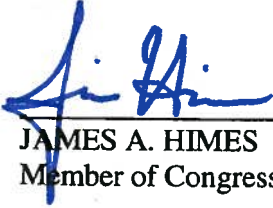
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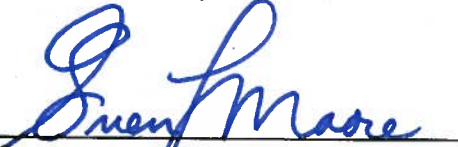
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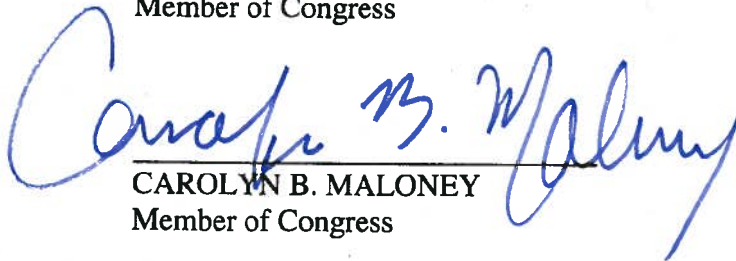
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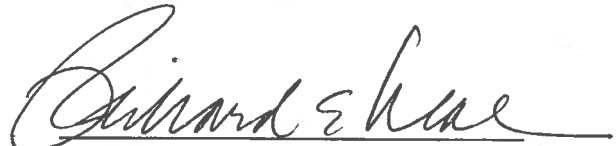
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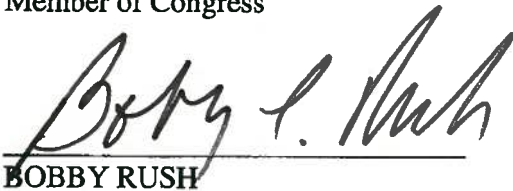
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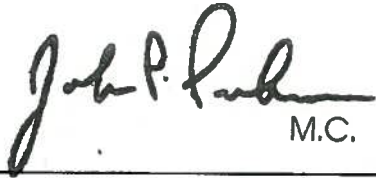
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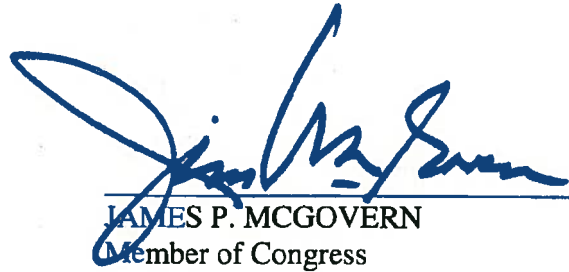

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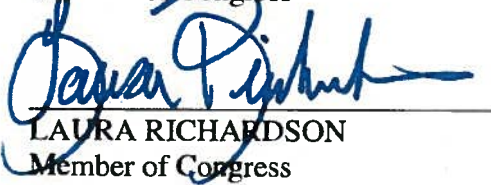
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CC: Mr. Bob Abbey, Director, Bureau of Land Management