

**Pros & Cons of Proposed Salazar Wild Horse and Burro Plan**  
 Submitted by American Horse Defense Fund, 10/21/09

<b>Proposed Plan</b>	<b>Background History</b>
<p>On October 7, 2009 Secretary of the Interior Ken Salazar proposed a Plan to protect the nation's wild horses and burros.</p> <p>The proposed Plan would create 7 new wild horse preserves through the purchase of private acreage in Midwestern and Eastern lands. Two of the proposed preserves would continue to be managed by the Bureau of Land Management and 5 would be managed under private partnership programs.</p> <p>The estimated initial cost of the proposed plan is \$96,000,000 million dollars.</p> <p>Additional proposals in the Plan include:</p> <ol style="list-style-type: none"> <li>1) Designations by the Secretary and/or Congress to showcase "unique herds" on public lands.</li> <li>2) Manage population growth of wild horses through fertility control both on the range and within the preserves.</li> <li>3) Creating more flexibility within the adoption process where appropriate, to provide an additional outlet for supporting the animals.</li> </ol>	<p>In 1971 Congress passed the Wild and Free-Roaming Horse and Burro Act (PL 92-195). The Act directed the Secretary of the Interior and the Secretary of Agriculture to protect and manage wild free-roaming horses and burros as components of the public lands, to achieve and maintain a thriving natural ecological balance, to remove excess animals and that these objectives were to be achieved at the "minimal feasible level".</p> <p>Several GAO reports (1980, 1990, 1991, 2008) found critical issues that have yet to be adequately addressed or resolved. In 1990, the GAO found that despite Congressional direction, BLM's decisions on how many wild horses and burros to remove from federal rangelands have not been based on direct evidence and that equivalent reduction in livestock grazing levels had not been done. In 2008, the GAO added BLM was unable to obtain accurate population inventories.</p> <p>Many of the proposals in the current Plan have already been attempted. Examples include:</p> <ul style="list-style-type: none"> <li>• In 2005, a trial program was initiated as a public/private partnership titled, "Wild Horse Pilot Project" with 100 geldings in Centennial, WY. According to Dr. Patricia Fazio, problems encountered were high mortality rates and eventual declines in free-roaming wild behaviors.</li> <li>• In 1988, the BLM entered into a sanctuary plan in North Dakota. The original costs were estimated at \$600,000 for 1,600 horses. However, costs quickly escalated and eventually the program cost over \$1 million a year.</li> <li>• Weakening adoption standards have resulted in past abuses such as fee-waiver programs and sanctuaries used as fronts for commercial exploitation. In 1986, 20,000 horses went to large scale adopters and were later sold to slaughter or abused, many while still owned by BLM employees. In 1996, a grand jury was investigating several BLM employees for profiting from the horses. The case was dismissed because prosecuting a few individuals was considered unfair as the issue was "typical of what is happening in the program everywhere".</li> </ul>

<b>PROS</b>	<b>CONS</b>
<ul style="list-style-type: none"> <li>• Acknowledges some of the long-standing problems with the Bureau of Land Management’s administration of the Wild Horse &amp; Burro Program and the management of wild horses and burros on public lands.</li> <li>• Recognizes and acknowledges the uniqueness of wild horse and burro herds throughout the West.</li> <li>• Considers ways to improve the Wild Horse and Burro Program.</li> <li>• Proposes non-lethal options to protect captured animals.</li> <li>• Recognizes sufficient habitat is needed to maintain herd health.</li> <li>• Recognizes and acknowledges the necessity to monitor the health, interrelationships and social dynamics of the wild horses and burros.</li> <li>• Expresses a willingness to dedicate significant funding to secure adequate habitat for the preservation and protection of free-roaming herds.</li> <li>• Attempts to mitigate the escalating costs of long-term holding facilities.</li> <li>• Indicates a willingness to enter into partnerships for the well being of wild horses and burros.</li> </ul>	<ul style="list-style-type: none"> <li>• The Plan fails to address comprehensive broad based remedies for current environmental concerns such as wildfire damage, drought and potential climate change. Instead, it places the restoration and maintenance of public rangelands solely on the back of the free roaming equine populations.</li> <li>• Long standing repeated concerns of malfeasance, waste, fraud and abuse have plagued the program since its inception. There is little evidence to suggest that the DOI has made sufficient progress to alleviate these concerns.</li> <li>• Incorporation of private vs. public acreage continues to reduce opportunities for public involvement in the Wild Horse &amp; Burro Program and fails to reflect the original tenets of the Act.</li> <li>• The provision to showcase unique herds as designated by the Secretary or Congress fails to honor the historic importance of all herds or reflect public and local community values.</li> <li>• Significant savings can be achieved by the use of public rather than private lands. Millions of acres were identified for use by wild horses and burros and these lands are already owned by the American people. Additionally, re-classifying lands currently managed by the DOI such as National Park Service and U.S. Fish &amp; Wildlife Service and/or evaluating lands under U.S. Forest Service jurisdiction may provide ample habitat to achieve the Plans objectives while greatly reducing the proposed costs.</li> <li>• The Plan does not indicate the Secretary has the same willingness to provide significant funding for on-the-range management of herds on publicly owned lands.</li> <li>• Focuses solely on private partnerships and/or management far removed from the public domain. It does not offer additional alternatives such as partnerships with agencies under the Secretary’s jurisdiction, other government agencies, organizations, groups or private individuals to maintain and manage wild horses and burros in their natural habitat on already available public lands.</li> <li>• Does not sufficiently recognize or honor a component of the Act’s original intent, which was to preserve historical ranges as much as historical herds so as to preserve and protect our nation’s Western heritage.</li> <li>• The 1971 Act distinguished Wild Free Roaming horse and burros from domestic equine because of their unique qualities of “wildness”. Zoo-like atmospheres and domestic settings fail to retain these qualities. As a result, eco-tourism in this kind of setting may be limited.</li> <li>• There is currently a wide array of flexibility within the</li> </ul>

adoption portion of the program, which includes reduced adoption fees, buddy systems, various trial programs and the "For Sale Authority". Further weakening of safeguards placed within the program to protect these national icons may nullify the intent of the Act, which was to protect wild horses and burros from unnecessary harassment, capture, death, commercial exploitation, slaughter and/or abuse.

- Currently, there are long-standing concerns regarding the genetic viability of the free-roaming populations still remaining on public lands. Adding non-reproducing herds as additional components of the many herds already considered genetically non-viable greatly increases these concerns. Additional issues that need to be addressed include:
  - 1) Kinds of fertility methods to be employed, as some have proven deadly.
  - 2) Impacts to herd dynamics and potential disruption of complicated social structures,
  - 3) Decreased qualities of wildness and free-roaming behaviors,
  - 4) Genetic viability to support herd health and future preservation,
  - 5) Self-sustaining populations capable of withstanding conditions such as harsh winters that may cause large scale population declines.
- As proposed, annual reproduction caps of 3,500 foals was selected solely on adoptability criteria. This poses a variety of challenges the Plan fails to address, some of which include:
  - 1) Allows the adoption program to become the primary consideration of all management actions within the program versus species preservation and on-the-range management plans.
  - 2) BLM reports historical demand for adoptable horses and burros favors younger animals. If gathers cull younger animals, it reduces both gene pool and future reproductive abilities of the remaining free-roaming herds. If older horses are taken, adoptions may decline.