



SOCIETY FOR RANGE MANAGEMENT

Nevada Section



May 12, 2009

The Honorable Nick Rahall
Chairman
House Committee on Natural Resources
2307 Rayburn HOB
Washington, DC 20515

The Honorable Doc Hastings
Ranking Member
House Committee on Natural Resources
1203 Longworth HOB
Washington, DC 20515

Dear Chairman Rahall and Ranking Member Hastings,

The Society for Range Management represents thousands of land users, land managers, and rangeland scientists. Our goal is to ensure long term sustainability of rangelands and to improve rangeland health, through the discovery and application of scientifically based research. The Nevada Section of the Society for Range Management (SRM) shares the Committee's concern about Wild Horses and Burro's (WH&B's). The American mustang is a symbol of the American West and our shared heritage.

However, the symbols are living breathing animals that were not part of the existing ecosystem when they were introduced to the North American Continent. As such, they are without natural predators throughout the vast majority of the land that they occupy. Wild, stray, and feral equids seem well-adapted to our western arid rangelands. They reproduce with great fecundity, their survival rates are consistently high, and their numbers continue to increase. These attributes alone lead to a number of issues and challenges for resource managers. Active management and population control by humans, is necessary to prevent the long-term and persistent degradation of the western ecosystem that is a known result of persistently large equid populations that remain above the appropriate management levels (AML).

The consequences of rangeland degradation from equids impacts more than the equids. Degradation of vegetation and soils can:

- decrease biodiversity (flora and fauna)
- weaken rangeland resilience to fire and invasive weeds
- diminish values society places on functioning rangelands

Rangeland degradation has the potential to dramatically increase the cost to society for management to achieve the various values that society demands and desires. We agree that WH&B's should be present on western rangelands; however, they must be managed in a manner that achieves and maintains a thriving natural ecological balance on the public lands. Their presence on public lands must be managed harmonious with, rather than dominating, other multiple uses as mandated by the Federal Land Policy Management Act (FLPMA).

The BLM estimates the current free-roaming population exceeds by some 9,400 the number that the BLM has determined can exist in balance with other public rangeland resources and uses. Nearly 3,000 of the 9,400 excess horses on public rangelands are located in Nevada. Additionally, off the range, there are



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nearly 32,000 other wild horses and burros that are fed and cared for at short-term (corral) and long-term (pasture) holding facilities. The cost for holding wild horses and burros in short and long-term facilities was \$21.9 million, accounting for more than half of what the BLM spent in FY 2007 on its total wild horse and burro program. In FY 2008, the cost exceeded \$27 million; three-fourths of the FY 2008 enacted funding level of \$36.2 million for the total wild horse and burro program.

The Nevada Section of SRM is very concerned that HB 1018 will result in severe negative effects not only on Nevada's rangelands which are currently home to the majority of wild horses in the west (16,143 hd. BLM, FY 08), but on all western rangelands in the west (33,105 hd. BLM, FY08). Introducing wild horses onto rangelands not occupied prior to where horses were found in 1971, will exacerbate and expand a problem that is presently nearly unsolvable. This is especially true given current spatial occupation, populations and limitations on agencies abilities (statutory, logistical, and economic) to manage WH&B's on the range and control excess numbers.

As the bill is currently written, it appears reactive to the very emotional public concerns brought forth by a well meaning but misinformed general public. One of the main reasons for the amendments made in 1978 to the 1971 WH&B Act, was recognition by land managers and Congress that WH&B populations were rapidly expanding unchecked and better management practices were required for protection of rangelands. H.R. 1018 affectively eliminates the 1978 changes to the original 1971 authorization, reinitiating the circumstances that lead to enactment of the 1978 amendment. Prior to enacting major changes to the 1971 WH&B Act that would eliminate or increase the difficulty of managing WH&B populations on public lands, there must be critical review of scientific research regarding WH&B's and rangeland management. Management issues must be identified, prioritized and reviewed in light of current science and past mistakes in order to develop recommendations that will serve as the basis for positive reform. Management of wild equids must be practical and feasible. The goal should be to ultimately have a positive effect on wild equids and all uses on public lands.

Recent testimony provided to the House Committee on Natural Resources by Ed Roberson, BLM Assistant Director of Renewable Resources and Planning was well prepared and delineated numerous and serious implications of the proposed legislation. The NV Section SRM shares many of these concerns including:

- Elimination of the use of helicopter gathers (virtually eliminating BLM's only effective and economical means to gather the animals for any management activity)
- Expansion of WH&B populations throughout the west
- Requirement that BLM "exhaust all practicable options to maintain populations on the range" before removing any animals.
- Restriction of humane destruction to only those animals that are determined to be "terminally ill."
- H.R. 1018 could, and predictably would, increase the operating costs of the wild horse and burro program in numerous ways.
- Removal of BLM's authority to sell animals
- Repeal of portions of the 1971 Act that specify when a wild horse or burro is no longer considered "wild."



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H.R. 1018 proposes to increase the WHB Advisory Board from 9 to 12 members. Developing consensus with nine members is difficult; expansion of the Board will increase the level of difficulty. More importantly, H.R. 1018 proposes to change the composition of the Advisory Board and eliminates representation by natural resource management organizations (rangeland science). Rangeland scientist input is critical to the Advisory Board for understanding biological and ecological processes and protection of rangelands for all multiple uses.

In summary, the Act is unsound and its unintended consequences will exacerbate an already unmanageable situation. HR 1018 will require turning the 30,000 excess horses in holding facilities back out on public lands and immediately double the population; it will give wild horses and burros access to all public lands; and it will prohibit the use of helicopters or any airborne devices for population control. BLM records demonstrate that wild horse populations consistently reproduce at the rate of 20% per year without predators or removal. If uncontrolled, sixty thousand wild horses increasing at a compounded rate of 20% per year for 10 years will yield 371,500 animals on public lands. They will multiply themselves six times in ten years. This is a formula for the most massive reallocation of the use of rangeland resources in the history of the United States. This will be at the expense of wildlife, threatened and endangered species, livestock grazing, rural communities, recreation and watershed management to name a few. It will trump all existing BLM land use plan allocations developed under the Federal Land Policy and Management Act in one legislative action. Moreover, for reasons previously defined, public rangelands will be subjected to universal replication of the infamous and widely reported Kaibab Deer Herd catastrophe in Southern Utah early in the 20th century. They will destroy their own habitat with a lag before the WH&B population's peak and start to decline with widespread famine causing tremendous and unnecessary pain and suffering. Eventually, when the public witnesses the full effect of the unintended consequences of this legislation, there will be massive public alarm and outcry.

The Society and the Nevada Section offers our assistance to the Subcommittee and Congress to provide scientific information on sound range science to protect rangelands and the health and welfare of WH&B's from the destructive effects of overpopulation.

Sincerely,

Ken Conley
President

Cc:

Senator Harry Reid
Senator John Ensign
Congressman Heller
Congresswoman Berkley
Congresswoman Titus
Senator Dean Rhoads
Assemblyman Pete Goicoechea
Governor Jim Gibbons

BLM Acting Director Poole
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