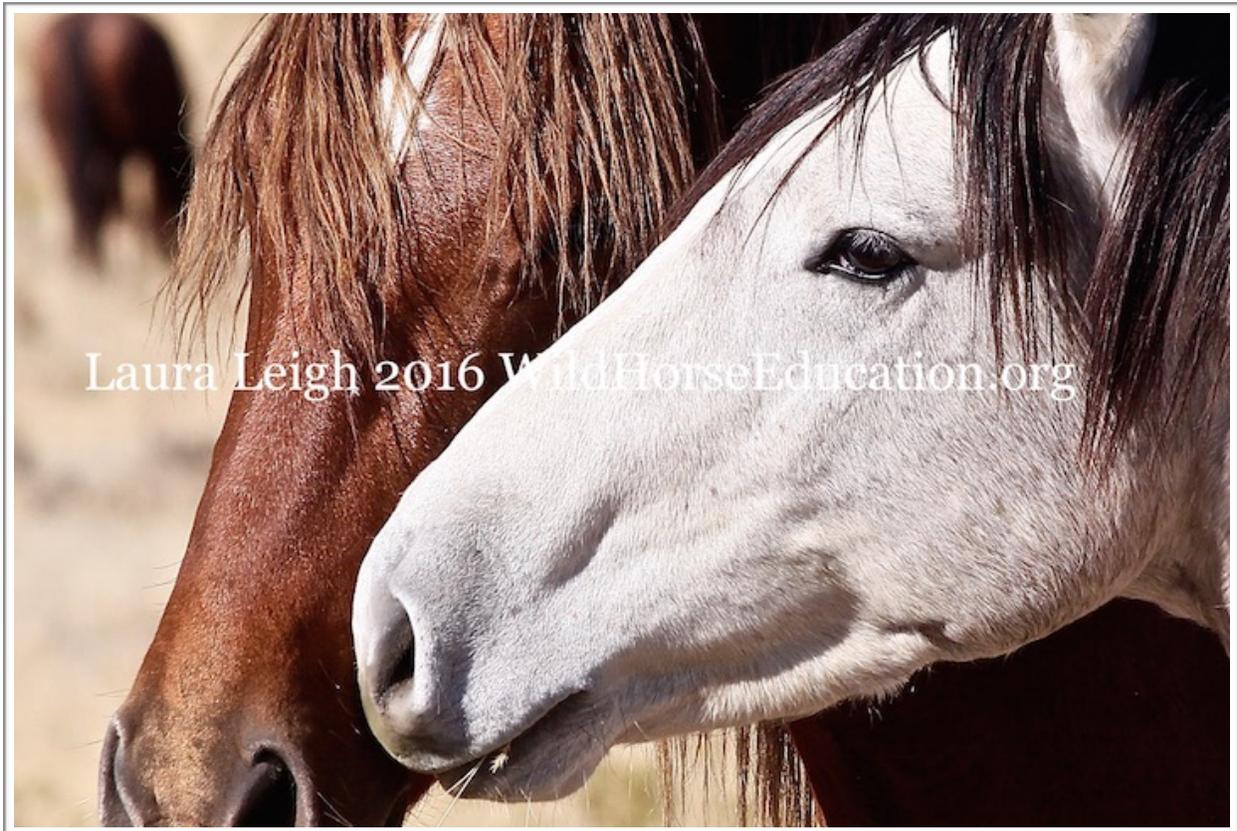


Wild Horses

Wild Horses and public land management



Wild Horse Education

Spring 2017

Why is the management of wild horses on public land such a controversial, contentious and misunderstood issue? Because profit driven interests have always “blamed the horse” and federal land managers have allowed it.

Wild horses are not a user of public land, they are a federally protected resource.

Facts, Wild Horses

What is the legacy of the American West?

Wild Horses, a small piece of public land management

All of public land is open to mining. Two thirds is open to privately owned livestock operations. Only about 12% of public land (Bureau of Land Management, BLM) is legally occupied by wild horses. In that small fraction of public land wild horses are given 16%, or less, of available forage.

Any discussion that involves management of wild horses on public land must first recognize wild horses are a fractional user of federal grazing land and are a resource under law, much like the grazing land itself, to be protected and preserved from encroachment by users of the public land for profit.



If wild horses were a primary cause of range degradation we would only see degraded habitat where we have wild horses, we have degraded habitat everywhere.

Findings:

- The BLM wild horse and burro program is severely flawed in theory and in practice (National Academy of Sciences, June 2013)
- The wild horse program is a casualty of the broken federal grazing program.
- Intimidation of federal employees, corruption within the system and marginalization of wild horse interests for convenience all play a factor in perpetuation of the broken system.
- Symptomatic issues, like falling adoptions, are not the cause.
- Proposing euthanasia of wild horses, or selling them to slaughter, is simply a proposition to continue the perpetuation of the intimidation, corruption and marginalization.
- Turning over management of the federal wild horse program to states or the ranching community, at the behest of those that intimidate and corrupt, is rooted in a failure to protect all interests and serve the public good at large.

Federal Grazing Program

When our federal grazing program began our western ranges were in severe decline and the environment was often violent. Federal authority has been seen as interference, including the wild horse program.

The following statistics were released in 2016 and compiled by multiple sources. We cite from EarthFix.

- Less than half the acres managed by the BLM grazing program meet benchmarks for rangeland health.
- One third of BLM grazing lands got failing grades for environmental health.
- Millions of acres have never been evaluated. Many of these areas contain wild horses.
- Before issuing a grazing permit BLM should do an assessment, but they are not required to.
- One third of livestock grazing permits are issued without an assessment.

- Hundreds of livestock permits are renewed even when rangeland health standards are not met.

Nevada manages more wild horses than all other states combined.

- 43.3 million acres of BLM land here are used for grazing.
- As of 2013, an estimated 10% of areas used for grazing met federal benchmarks for rangeland health.
- An estimated 54% had not been evaluated.
- At least 516 ranches manage an estimated 2.1 million in animal unit months (AUM, monthly forage allotment).
- Nearly 60% of grazing permits in Nevada were issued without a full environmental review.

In 2016 the Government Accounting Office (GAO) issued a report on public land livestock grazing and found that trespass, too many or on the range outside the boundaries of legal use times, is a pervasive problem.

- Trespass causes ecological damage.
- Land agencies do not adequately document violations
- Fees can be too low to serve as a deterrent

Blaming a fractional use of federal grazing land for widespread degradation is illogical.

Inequity in Process and Practice

Addressing flaws in the federal grazing program is an explosive, overly emotional and potentially violent matter.

In 2014 Public Employees for Environmental Responsibility (PEER) released a report that cited 15 reported cases of threats against BLM employees. The document did not include the “Bunkerville” incident in Nevada.

Livestock permittees that run in trespass, create public protests, and even make threats, are not prohibited from doing business with agencies.

Wild horse advocates that legally engage process, offer significant assistance but criticize aspects of the program, legally, are prohibited from engaging in volunteer efforts that would fix severe deficits in the program.

Offers to supply manpower and building materials for shelters at holding facilities are denied.

Attempts to volunteer for multiple purposes such as range clean up, fencing removal, data collection and fertility control of wild horses are thwarted. Sometimes at the urging of those responsible for threats to the BLM themselves. Sometimes advocate efforts are thwarted at the urging of BLM contractors that are upset that advocacy criticizes a “roundup.”

The most demonstrative displays made by *any* wild horse activist include falling on the floor and pretending to be a dead horse at a public meeting, putting images on social media of wild horse roundups or simply calling the program broken.

Wild horse management, a flawed program

The Bureau of Land Management (BLM) wild horse program is significantly flawed. In 2013 the National Academy of Sciences (NAS) issued a 400 page report outlining deficits in the program.

The Report:

- Subject matter and data reviewed was controlled by the Bureau of Land Management (BLM), all aspects of the program were not evaluated.
- Failed the agency on any substantive science in practice to justify actions.
- Found large scale removals increase reproduction.
- Genetic data and analysis use in practice is severely flawed.
- Essentially no data exists to document critical habitat.
- Statistics on the national population size cannot be considered scientifically rigorous.

“In general, the handbook (Wild Horse and Burro) lacks clear protocols for evaluating habitat components other than forage availability. That is critical because without clear protocols specific enough to ensure repeatability, the monitoring organization cannot

determine whether observed change is due to changes in condition or to changes in methods. Protocols should also include establishment of controls when the goal is to distinguish treatment or management effects from other causes of change.”

Since the report was issued the agency has not created, nor adopted, the recommendation in the report as a whole. The report has been cherry picked and only provisions that forward current practices have even been considered.

The Blame Game

Wild horses are blamed for widespread degradation of habitat without scientific justification (NAS review).

Falling adoption rates of wild horses by the public are blamed for increasing numbers of wild horses in holding, instead of flawed range management practices.

Wild horse advocates that litigate flawed practices are blamed for financial hardship, instead of fixing the flawed practices.

When wild horses are found in decreased body condition on damaged rangeland they are blamed for their distress, without scientific justification.

As an example: 100 wild horses may be on a range (fenced and without the ability to leave) for twelve months in a calendar year. 500 domestic European cattle can be turned out for six months, during the growing season. Domestic cows rarely travel more than two or three miles from a water source or travel uphill at more than a 30 degree slope causing the lowlands to be over grazed. In the winter months, when the wild horses travel down into those lowlands they are blamed for the degradation and removed. The permit may have even run several months in trespass.

Any photo taken of a distressed wild horse will be presented as evidence of overpopulation of wild horses. Often you see the same horse, or same range, being misrepresented as to location. The BLM, that is well aware, stays silent or participates in the ruse.

Fertility Control and Data Collection

Fertility control of wild horse populations comes in many forms. The agency fails in using these forms in any appropriate, scientific, manner. The National Academy of Sciences recommends fertility control.

- BLM awarded \$11 million in 2015 to studies to permanently sterilize wild horses instead of awarding that sum to gather the data to see if permanent sterilization was genetically justified (NAS review) or if, scientifically, wild horse herds were causing any widespread range degradation (NAS review).
- Treats less than 5% of the wild horse population with any fertility control.
- The majority of fertility control treatments still contain a large removal component, that increases reproduction.
- Fails to retreat populations.
- Treats populations in a manner that can cause out of season, winter months, birth to wild horse mares creating more stress in the population.
- Fails to move data collection and fertility control programs forward where they have willing volunteers.

Agency staffing

Wild Horse and Burro Specialists at the field level spend significant time working on projects related to profit driven uses, mining and livestock. In practice this can amount to more than half of their daily duties.

In Nevada the Battle Mountain District manages more wild horses than any other spread over two field offices, Mt. Lewis and Tonopah. Each field office contains one wild horse employee. Even when approved to hire another individual, the office hires staffing to accommodate other interests and the position is not a priority.

Volunteer efforts to assist with the wild horse program are thwarted by those engaged in political and physical intimidation.

Conclusion:

- The BLM wild horse and burro program is severely flawed in theory and in practice.
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