



Nevada Farm Bureau Federation

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February 14, 2022

U.S. Congresswoman Dina Titus
2464 Rayburn House Office Building
Washington, D.C. 20515
(delivered via email)

Dear Congresswoman Titus:

We are writing today to express our concern with the legislation you introduced on February 8, 2022. We have reviewed the language of H.R. 6635 and wish to share our organization's perspective on the effort you are seeking to carry out in regard to reduction of overpopulation of Wild Horses and Burros, especially in Nevada.

The Bureau of Land Management (BLM) is working to accomplish the difficult and long-overdue process of bringing Wild Horse and Burro populations to their Appropriate Management Levels (AML). Based on 2021 BLM estimates the population totals were 71,735 Wild Horses and 14,454 Burros. This overall total of 86,189 compares with a maximum AML level of 26,785 (slightly below 325 percent above the maximum AML level).

Specifically for Nevada the 2021 BLM estimates are 42,994 Wild Horses and 4,087 Burros...(slightly below 60 percent of the total Wild Horse population for the national total.) These combined Wild Horse and Burro numbers of 47,081 compare with the state's AML of 12,811 (slightly more than 367 percent above the maximum AML level for Nevada).

The long-term over-population of Wild Horse and Burro populations has had substantial rangeland impacts pushing some areas over critical thresholds which could make rehabilitation nearly impossible. Drought has significantly magnified the impact of over-population in a way that not only further damages rangelands, but also is causing serious health issues for the Wild Horses and Burros. Starving animals or animals of thirsting to death is an inexcusable result of not properly managing populations to fit appropriate levels.

In their announced 2022 Fiscal Year Plan, BLM has indicated that they will be working to gather 22,000 Wild Horses and Burros from over-populated herds – remove at least 19,000 excess animals and provide fertility treatment to at least 2,300 animals before releasing them back to the federal lands. In 2021 BLM had their highest level of removals with 13,666 Wild Horses and Burros and fertility control measures were administered to 1,160. Increasing the numbers of gathers to reach the 2022 objectives will require a major step beyond last year's success rate.

In spite of the anticipated accomplishments of gathers and fertility control, Wild Horse populations grow between 15 and 20 percent. These rates of increase would result in 12,928 to 17,238 more animals in 2022 above the 2021 herd estimates. These numbers on the low rate of increase (15 percent) would have a net reduction of 738 of the 13,666 animals removed. At the higher rate of increase (20 percent), regardless of the 13,666 animals being removed in 2021 the overall population would still have over 3,500 increases.

Wild Horse and Burro gathers using helicopters have proven to be humane and effective tools for dealing with the larger numbers of animals that need to be removed over wide areas or through rough terrain.

In the wording of H.R. 6635 you assert that fertility control and other methods are more humane and cost-effective. Sub (7) in the same section indicates that the Wild Horse and Burro Program spends less than one percent of the budget on implementing fertility controls.

BLM's 2021 fiscal year breakdown of expenditures indicates that "Gathers and Removals" have roughly four percent of the expenditures for the program. Because of the manner in which gathers also are necessary means to apply fertility controls it is difficult to see how relying totally on fertility measures would result in meaningful gains in achieving necessary reductions of the over-populated numbers that are being experienced. Most knowledgeable persons understand that fertility measures could be an important tool for maintaining populations from excessive growth, but cannot result in reducing numbers with the present level of over-population.

A diverse group of stakeholders collaborated to bring forward "The Path Forward For Management of BLM's Wild Horses & Burros" outlining short and long-term solutions for the health of Wild Horses and Burros as well as the well-being of rangeland resources. These points included:

1. Relocate removed Wild Horses and Burros to more cost-effective pasture facilities
2. Contract with private parties to secure lower-costs leasing of land for long-term humane care of removed horses and burros
3. Apply proven, safe and humane population growth suppression strategies to every herd that can be reached utilizing trained volunteers, Agency staff and animal health professionals, as individual Herd Management Areas (HMA) dictate to prevent repeat gathers
4. Promote adoptions in order to reduce captive populations and costs (to this point 64 percent of BLM's FY 2021 Expenditures of the Wild Horse and Burro Program budget went to "Off-range Holding costs)

BLM's multi-year plan to achieve and maintain AML of Wild Horses and Burros on the federally-managed lands requires a full range of options and tools, including gathers to reduce over-population.

Congressional actions like H.R. 6635 would seriously thwart the activities that are being carried out to achieve AML for Wild Horse and Burro populations as well as eventually bring impacted landscapes back to a status capable of providing habitat for wildlife and all multiple use stakeholders.

Nevada Farm Bureau stands strongly in opposition to H.R. 6635. Undermining the capability for BLM managers to conduct necessary gathers, reduction of over-populated Wild Horse and Burro herds and implementation of responsible fertility management does not serve the best interest of the horses and burros nor the rangelands of the West or Nevada.

We encourage you to confer with the various multiple diverse coalitions which have formed to address improved management of Wild Horses and Burros.

Thank you for this opportunity to share our perspective on this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Bevan Lister". The signature is written in a cursive, flowing style.

Bevan Lister, President
Nevada Farm Bureau Federation