



Animal Welfare Institute

900 Pennsylvania Avenue, SE, Washington, DC 20003

The Bureau of Land Management
National Wild Horse and Burro Advisory Board
June 2023 Public Meeting

RE: Public Comments to the National Wild Horse and Burro Advisory Board

Thank you for the opportunity to provide comments today. My name is Dr. Joanna Grossman, and I am the Equine Program Director for the Animal Welfare Institute in Washington, DC. As one of the nation's oldest animal protection groups, AWI has advocated for the humane stewardship of our nation's wild horses and burros since the 1950s. AWI worked towards the passage of the Wild Horse Annie Act, as well as the 1971 Wild Free-Roaming Horses and Burros Act.

I wanted to highlight a few key priorities. First, we appreciate the Bureau of Land Management's recent efforts to increase the administration of proven and safe fertility control methods through its notice of funding opportunities for on-range activities. Close collaboration with stakeholders will undoubtedly play an important role in improving the management of our nation's federally protected wild horse and burros; by the same token, we hope that the BLM itself will increasingly take a proactive approach when it comes to fertility control administration given the resources at its disposal, particularly with the requested budget of \$155 million for the Wild Horse and Burro Program budget in FY24. We were pleased to see that Congress included language in the FY23 omnibus directing the BLM to set aside \$11 million of its overall budget for use of immunocontraceptive vaccines and hope the agency will treat this as a floor, rather than a ceiling.

With respect to fostering partnerships, we encourage the agency to conduct outreach to nonprofits and community groups in order to identify opportunities for collaboration. AWI co-leads the Homes for Horses Coalition – a network of nearly 500 equine rescues and sanctuaries across the United States. We would welcome the opportunity to have BLM staff speak to our membership to better identify areas where groups may be able to assist.

From our perspective, a management approach premised on mass removals is ineffective and counterproductive. As the National Academy of Sciences has noted, mass removals often prompt compensatory reproduction, leading to an inability to stabilize populations on the range. The removal of 20,000 horses and burros during fiscal year 2022 – a historic high for the agency – is completely unsustainable. Financial considerations aside, roundup operations come with significant risks; the injuries and fatalities that result are too great a price. We support bipartisan legislation recently introduced in Congress to prohibit helicopter roundups. The Wild Horse and Burro Protection Act was prompted in part by footage of a Nevada roundup last year that showed a young colt's leg snapping in half while he was relentlessly pursued by a helicopter.

During the Wyoming Checkerboard roundup of 3,500 horses – the largest in U.S. history – horses died of broken limbs and necks, and even from a ruptured organ. We were gravely disappointed to see the BLM finalize its plan to move forward with the elimination of millions of acres of designated wild horse habitat in the Checkerboard region earlier this spring. Over 70,000

Americans previously signed a petition to the Interior Department opposing the BLM's sweeping removal of almost half of the wild horses in Wyoming. The BLM's management plan is especially troubling in view of the Tenth Circuit's 2016 ruling that found that the agency had violated both the Wild Free-Roaming Horse and Burro Act and Federal Land Policy and Management Act in removing horses from the Checkerboard by treating public lands as though they were private.

From a broader perspective, such extreme plans do not offer a viable path for meeting the BLM's obligations under the law. A proactive approach to implementing safe, proven, and humane fertility control is key to keeping horses on the range in their natural habitats and minimizing the exorbitant costs associated with roundups and holding.

Thank you again for the opportunity to provide input on behalf of the Animal Welfare Institute.

Sincerely,

A handwritten signature in black ink, appearing to read 'JG', written in a cursive style.

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