



Animal Welfare Institute

900 Pennsylvania Avenue, SE, Washington, DC 20003

The Bureau of Land Management
National Wild Horse and Burro Advisory Board
January 2025 Public Meeting

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

My name is Dr. Joanna Grossman, and I am the Equine Program Director for the Animal Welfare Institute. As one of the nation's oldest animal protection groups, AWI has advocated for the humane stewardship of our nation's herds since the 1950s.

With over 66,000 federally protected wild equines in captivity, we implore the BLM to explore novel solutions to the exorbitantly expensive and endless cycle of rounding up horses and funneling them into holding facilities. Keeping horses on the range should be the priority – from a welfare standpoint, a cost efficiency calculus, and according to the agency's mandate under law.

We have stressed at length the importance of undertaking a proactive approach to fertility control, but additionally, the BLM should consider redesignating HMA boundaries, initiating land swaps, and converting HAs back to HMAs as appropriate – i.e., raising the AML up from zero where conditions can support the presence of herds. Wild horses have lost over 22 million acres of land that they once had available to roam; this ever-dwindling trajectory is unsustainable for horses to be managed successfully.

Troublingly, in its budget request for FY25, the BLM included a staggering \$15 million for a permanent sterilization program. We ask the agency to be transparent as to how it is spending this sum and what these plans entail. As the agency is aware, there was significant public outcry – as well as opposition from lawmakers and veterinarians – to the agency's proposed use of gruesome surgical sterilizations in the last few years.

There is a strong dissonance between a willingness to devote \$15 million towards an amorphous permanent sterilization program while the agency administered a paltry 720 treatments of PZP and GonaCon in FY23. In that same period, thousands of wild equines were removed from the range. Congress is on track to appropriate somewhere on the order of \$143 million for wild horse management for FY25, so we sincerely hope the BLM will use these funds to adopt a proactive, humane, and sensible approach towards managing our nation's federally protected wild horses.

Finally, I briefly want to reiterate our request that the BLM switch to veterinary vouchers rather than direct cash payments for the Adoption Incentive Program. The problems with the program and potential for abuse have been well documented; issuing vouchers for veterinary care is within the BLM's control and represents an immediate positive step the agency could take to better ensure the welfare of these horses while still providing a valuable incentive to interested adopters.

Thank you for the opportunity to provide comments.

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