



For America's Heritage

Public Lands Foundation

P.O. Box 7226 Arlington, Virginia 22207

December 1, 2009

Ms. Robin Lohnes, Chair
National Wild Horse and Burro Advisory Board
Bureau of Land Management
National Wild Horse and Burro Program, WO-260
Attn: Ramona DeLorme
1340 Financial Boulevard
Reno, Nevada 89502-7147

Dear Ms. Lohnes:

The Public Lands Foundation (PLF) encourages the Advisory Board to consider a new approach to the management of wild horses and burros on the National System of Public Lands administered by the Bureau of Land Management (BLM).

PLF is a national organization that advocates for sound scientific decision-making on the National System of Public Lands. We are a totally volunteer organization made up mostly of former BLM employees with many years of experience in natural resource management.

PLF is very concerned about the current situation facing BLM and its management of wild horses and burros. This program, which is based on the Wild Free-Roaming Horses and Burros Act of 1971, has been impossible for BLM to manage on a scientific basis due to many factors, including a lack of appropriated funds, and public and congressional opposition to some of the remedies provided in the 1971 Act.

This program, as others, must be about maintaining a thriving ecological balance on the rangelands, considering all of the legitimate uses permitted by law. We believe that is what Congress intended in 1971. It ought to be about maintaining healthy horses on healthy rangelands. Without healthy rangelands, there can be no herds of wild horses, cattle grazing or healthy wildlife populations as envisioned in 1971.

For years there have been arguments and lawsuits by all parties who have to share the range over the number of horses that should be there, how they should be managed, where they should be maintained, how they should be removed, how fertility control should be implemented, what to do with the horses that are removed, and how to ensure that the horses end up with good homes if they are adopted. This has resulted in the untenable position that BLM is in today—thousands of horses in long- and short-term holding facilities and thousands of horses on public lands in excess of the carrying capacity allocated to them.

We support the intent of the current Secretary of the Interior's proposal to create sanctuaries in the Midwest and in the East as a short-term solution for what to do with the 32,000 horses currently in long-term and short-term holding facilities.



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On the other hand, we must point out that the 37,000 wild horses and burros, which have virtually no natural predators, and roam in 10 Western states, are not endangered. In fact, their 20 percent annual reproduction rate requires that thousands of horses be removed from the arid and semi-arid rangelands in the West each year to maintain a thriving ecological balance, as envisioned in the 1971 Act.

At a recent meeting we attended on the subject of wild horses and burros, Dr. J. Wayne Burkhardt of Ranges West stated, "There will be no solution to the dilemma until society decides on how many wild horses will be acceptable." We believe this to be a fact and a starting point for a long-term solution. Wild horse advocates, wildlife interests, livestock operators, and public land managers must come together and determine the acceptable number of wild horses and burros that should be maintained in the West. They then will need to agree on a way to reach that level and maintain it in the long-term. This would then need to be codified by Congress.

We believe a long-term solution should begin with a grass roots effort to bring all of the parties together to determine the acceptable number of wild horses and burros that should be maintained in the West, and to discuss the creation of National Wild Horse and Burro Ranges to accommodate this acceptable number of animals. The National Ranges would be managed for the maintenance and protection of wild horses, burros and wildlife. The existing wild horse and burro Herd Management Areas on BLM public lands would be eliminated, and the animals moved to the National Ranges.

We believe the long-term solution should be found on the range where wild horses and burros belong and not in sanctuaries far removed from the West.

We encourage you to give this new approach careful consideration as you make your recommendations to BLM. And, we would welcome the opportunity to discuss this with you in more detail.

Sincerely,

/s/ Ed Spang

Ed Spang, Vice President
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