October 16, 2014

To the Members of the BLM Northeastern Great Basin Resource Advisory Council:

We, the undersigned, urge the Bureau of Land Management's (BLM's) Northeastern Great Basin Resource Advisory Council (RAC) to endorse a pilot program for the use of the Porcine Zona Pellucida (PZP) fertility control vaccine in the BLM Ely District.

Such an endorsement is in line with the recommendations of the National Academy of Sciences (NAS) in its June 2013 report, "Using Science to Improve the BLM Wild Horse and Burro Program: A Way Forward."

The NAS report concluded that continued removals *"are likely to keep the population at a size that maximizes population growth rate, which in turn maximizes the number of animals that must be removed and processed through holding facilities."* The NAS also concluded that *"Continuation of 'business as usual' practices will be expensive and unproductive for BLM and the public it serves"* and that *"Tools already exist for BLM to address many challenges."* The primary tool available immediately and proven effective over decades of use is the PZP vaccine.

We support the widespread use of PZP to stabilize, and if need be, reduce wild horse herds over time because it is reversible, non-hormonal and has proved safe and effective in more than two decades of use on wild horses and other wildlife species. The PZP vaccine represents the most humane and cost-beneficial alternative to the current, cost-prohibitive wild horse removals.

In contrast with other fertility control drugs, PZP has the least impact on natural wild horse and herd behavior. To reduce the inherent stress associated with roundup or gather operations, we support the implementation of a policy that would give preference to conducting Capture-Treat-Release (CTR) PZP application operations in a manner that respects and maintains the social structure and family bands. Preference to water and bait trapping options should always be given before resorting to helicopter drive operations.

The BLM removes thousands of wild horses from public lands each year only to warehouse the vast majority in government-holding facilities. In 2001, there were approximately 5,000 wild horses in government-holding facilities. Today, nearly 50,000 wild horses are stockpiled in government-holding facilities, a number that, at minimum, equals, if not exceeds the population left on the range.

While complete reform of the BLM's Wild Horse and Burro Program is needed, the widespread use of PZP as a primary means of managing wild horse herds is an immediate first step that must be taken in order to reduce the numbers of horses removed from the range. If the PZP option is not fully implemented, the BLM will likely continue the endless and unsustainable cycle of rounding up and stockpiling wild horses – that comes at a great cost to the wild horses and the American taxpayers.

We thank the members of the RAC members for consideration of this important topic.

Sincerely,

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September 21, 2014

Dear Ms Nations,

This letter is a response to the August 28th post by Laura Leigh titled Resource Advisory Council (RAC). She states that you presented an alternative management strategy to the board that involves catch, treat and release (CTR) as a temporary strategy, instead of broad scale removals. The proposal involves using birth control to temporarily reduce reproduction rates as data is gathered to support genetic viability, migratory patters and all of the data needed to create appropriate management of wild horses and burros as outlined by the National Academy of Sciences report released last June. Laura also said the proposal would be published on her website as soon as it was updated based on the questions asked that day by the RAC. I have been waiting to see the published proposal but to date I have not seen any proposal.

I was glad to see that you are proposing CTR as just a temporary strategy. But if I may I would like to share with you what we as a contractor have observed and experienced when CTR gathers are done. As you know we have been doing wild horse and burro roundups for the BLM for a very long time. So first let me state that from our years of experience the most promising approach for effectively managing Wild Horse and Burro (WHB) populations was the way it was done early on in the 70's and 80's. I will try to explain why gathers when there was no CTR were so much more humane and successful in managing the numbers.

During the 70's and 80's the approach was to go into different HMA's or areas and gather a specific number of animals to try to reach AML. This would mean that if the AML needed to be 300 and there were 500 animals in the area we would go capture 200 head and leave the rest of the animals alone. The AML number was reached and the other bands remained intact. Therefore there were still viable bands with their herd structure. The reproduction rate was not stimulated because these bands were not disturbed. No captured animals were released so the animals did not become harder to capture a second time. The WHBs responded to the herding techniques of the helicopter and so could be herded very humanely. Then in the 90's because the adoption program would no longer support the number of

animals that needed to be removed from the range, and wild horses were being housed and fed, the BLM started to capture and release. Sometime it was CTR. We would capture as many animals in an area as possible or as many as there was funding for and then release the older animals. At first it was above 9 years old and then it was above 5 years old. This really stimulated the reproduction rate. I do not have so called scientific evidence but my records show that before we started catching and releasing the foaling rate was below 16%. Karen Sussman and her organization International Society for the Protection of Mustangs and Burros, has for 13 years, studied two herds in South Dakota. She has information that would support this much lower reproduction figure and also explains why it is so important to keep the herd structure intact out on the range.

After we started catching and releasing we have seen the reproduction rates as high as 30%. Releasing animals also causes havoc on the range after they are released and the studs are trying to acquire a new harem. This is especially true if more studs than mares are released. It also causes the mares to be bred younger and younger. And it has caused the animals to be harder and harder to gather humanely because animals that have been released can be much more difficult to capture a second or third time. In some areas now even our very experienced animals herding pilots are having a hard time capturing over about 50% of the animals in an area during a single roundup. And they are having a harder and harder time herding them humanely. After wild horses have been captured and released it takes several years before the areas start to have animals with good herd structure.

Now there are very few places left where you have family bands that contain animals that have not been captured before. You no longer have bands that can be put together and herded slowly to the trap. You have many small bands and often just a stud, mare and yearling and maybe a foal. The studs have had to fight for their mare. The studs are very protective of their mare or mares and will not just move away from the helicopter and head in the direction of the trap. They often turn and appear to fight the helicopter. Or they just take off running. The pilot ends up fighting to get control of this little band before he can get them to start in the direction of the trap. Very seldom can the pilot put more than one of these little bands together and bring them in at the same time. Sometimes they may all head in the right direction but often will split apart especially if the pilot has to put any pressure on them to herd them in the right direction. So while the pilot is getting control of one small band the other wild horses are moving further away from the trap. We have been using two helicopter to move as many bands towards the trap as possible but still when the animals have been captured and recaptured and are in small bands and do not bunch together animals are moving away from the helicopter as others are herded to the trap. Then when the pilot goes to capture these bands they will have to first fight to get control of them and to force the band into heading towards the trap and the animals will also have to come a lot further than they should have had to come.

Horses that live in the trees that have been caught before are even more difficult to capture a second time especially when they are in small bands. Pilots can no longer just herd the animals using the very humane pressure and release method.

I think you need to really consider what I have just said when you propose any CTR gathers. Especially in a lot of Nevada where the wild horses live in the trees and because most areas have had animals captured and released back even very experienced pilots will not be able to humanely capture the percentage of animals in a HMA to get enough mares to treat to have much effect on the population of the herd. Then the next time these animals would be even more difficult to humanely capture.

Thank you for your time. Please give me a call if you have any questions or comments on what I have written. My number is 801-361-3100.

Sincerely,

Sue Cattoor

Sue Cattoor, Secretary
Cattoor Livestock Roundup, Inc.

Cc: Laura Leigh

From: "Jay Kirkpatrick" <jkirkpatrick@montana.net>
To: "Jeanne Nations" <jnphotography@hughes.net>
Sent: Tuesday, September 30, 2014 10:05:24 AM
Subject: Re: RAC Members

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THIS LETTER IS IN RESPONSE to MRS. CATTOR'S LETTER only!

Dear Ms. Nations,

Thank you for sharing the recent letter from the Cattoors, regarding your proposal for the Elk horses. I would like to respond.

Paragraph 2: The letter states that the writer will share "observations and experiences" over their years of rounding up horses. Observations and even experiences are far different from data derived from designed studies, carefully conducted research, proper and adequate collection of data, and proper analysis of data, all of which can lead to sound conclusions. However, even that is insufficient. The hypothesis, methodologies, data collection and analysis must also be subjected to scientific peer-review before any conclusions are accepted as fact. That is what separates science from unfounded opinion. The author cannot provide a single published paper which supports her "observations and experiences." With regard to the efficacy and safety of PZP, we can. To be fair here, many advocates also make the same error and substitute "observation" for sound scientific evidence.

Paragraph 2: The author also states that the most promising approach is the round up and removal paradigm of the 70s and 80s. However, she fails to point out that we have some 50,000 horses in holding as a result of that policy and that each one is costing the taxpayer $49,000 over its lifetime to maintain it. That comes to $24 million taxpayer dollars. It does not include the cost of rounding up those animals either. From an economic standpoint, USGS economists have shown the folly of round up and removal versus the savings inherent in fertility control (see Bartholow 2007. J. Wildl. Manage. 71:2811-2819). Another, more recent study shows evenb greater dsavings by attacking the problem of reproduction rather than by removing animals (se de Seve and Boyles-

Griffin. 2013. J. Zoo. Wildl. Med. 44:34-37). That is not "observation and experience", but hard figures.

Paragraph 3: The author mentions the "animals left behind". She does not bother to explain that they will be breeding, year after year, and the problem goes on. That isn't even science. That's common sense. It is, in fact, the "animals left behind" that are causing the problem, i.e., reproduction.

Paragraph 3: The author claims that there has been no compensatory reproduction by reducing the herd size by round ups. First, this flies in the face of well-established general biology in mammals - almost all mammals. As you reduce density of a population, reproductive success increases. The author offers no scientific evidence for this lack of compensatory reproduction. ON the other hand, this has been documented, scientifically, in diverse species, but I'll just cite two here, for the sake of brevity. Deer hunting increases reproductive success in those left behind (see RIchter and Labisky 1985. J. Wildl. Manage. 49:904-971); Compensatory reproduction in wild horses was documented more than 20 years ago (see Kirkpatrick and Turner 1991. J. Wildl. Manage. 55:649-652). Neither of those references (and there are many others) deal with "observations" but in fact rather, validated, peer-reviewed scientific studies.

Paragraph 3: The author alludes to changes in the 90s, when BLM started CTR and points out it didn't help much. The flaw here is that CTR programs through 2009 used something called "PZP-22", which, in short, doesn't work as a contraceptive. THat was discovered during the 2009 CTR programs, when good data, where people on the ground knew every horses, were able to document the poor results. Keep in mind that native PZP, as it has been used successfully, is not the same as "PZP-22".

Paragraph 3: The author states that foaling rates were below 16%. If she meant 16% of the entire herd, she would still be low for virtually all HMAs. If she meant 16% of adult mares, she would be so low as to defy reality. Feist and McCullough (1975. J. Reprod Fert. 23:13-18) reported 43% foaling rates (foals/mature mares); Boyd (1980. MS Thesis, U. of Wyoming) reported 53% foaling rates in the Red desert; Green and Green (1977. Proc.Nat'l Wild Horse Forum, U. Nevada) reported 50% foaling rates for Stone Cabin Valley and 53% for Carson National Forest; SAlter (1978. MS Thesis, U. of Alberta, Edmonton, AL) reported 83% foaling rates for Sable Island, and Welsh (1975. Ph.D. Thesis, Dalhousie University, NS) reported a 68% foaling rate for the same horses. It is noteworthy that both these latter studies focused ona herd where winter mortality was extremely high and densities drastically reduced (as in round ups!).

In the Granite Range, Berger (1983. NAture 303:59-61) made a distinction between fecundity in stable bands and in bands where the herd stallion has been recently replaced by a new stallion. Stable bands had foaling rates of 81% while unstable bands had foaling rates of 37%. Over eight years, Keiper and Houpt (1984. Am. J. Vet. Res. 45:991-995) reported a 57% foaling rate among thr Assateague horses. Seal and Plotka (1983. J. Wildl. Manage. 47:422-427) reported age-specific pregnancy rates of 35% (for 2-year olds), and a collective 67% for the entire herd in Challis, ID. There is a plethora of additional data, but this should make clear that 16% foaling rates are imaginary at best.

The author goes on to cite ISPMB sanctuary as having "information" based data. We are extremely familiar with this sanctuary and decided to withdraw our contraceptive services, after 4-5 years largely because the conditions under which these horses live are so poor that BLM horses living in long-term holding can be considered to be living in luxury. No studies have been conducted there and no data have ever been published.

Paragraph 4: This entire paragraph is contradictory. First, the author states that disruption caused by CTR doubled the foaling rate (from 16% to 30%), while ignoring (1) that removal lowered the density and caused compensatory reproduction and (2) ignoring Berger's data showing the poorer foaling rates that accompanied round-up related disruptions. But then she goes on to point out that the mares were being bred at younger and younger ages (which is a component of compensatory reproduction).

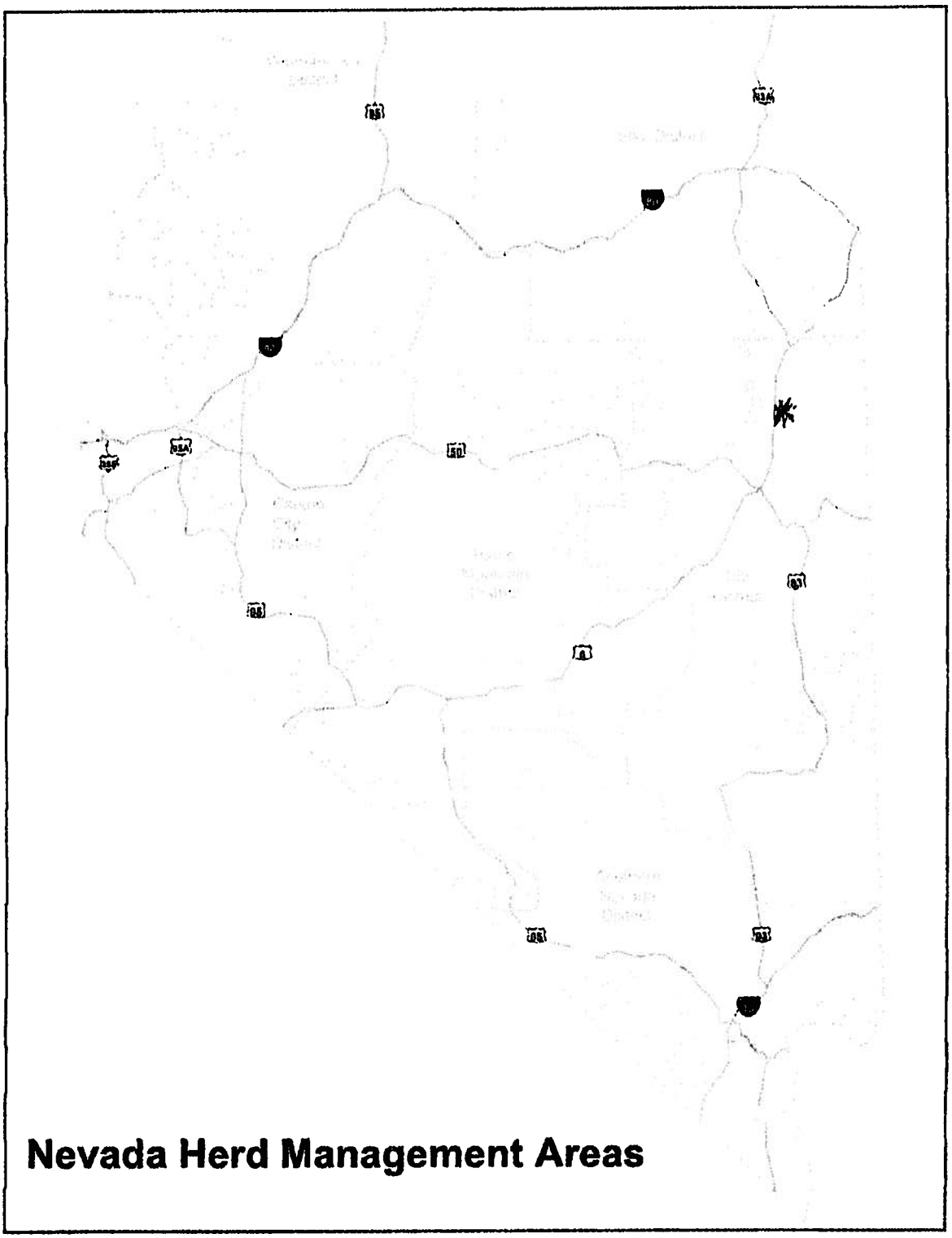
The last large paragraph: The entire CTR program was built upon the idea that "PZP-22" worked as an effective 2-year contraceptive. That premise proved to be false and currently BLM is funding a very large study to find out why "PZP-22" doesn't work. The research conducted at Carson City over the past several years was very well done and showed, conclusively, that "PZP-22" doesn't work. Thus, the entire paradigm of CTR as practiced was flawed and will not be successful until a one-inoculation, long-acting form of contraception is developed. However, to continue to argue that round up and removal is the only solution flies in the face of the NAS report, every economic study and it does not answer the question of the cost of this approach ($75+ million) or the failure of this approach to solve the problem (because it doesn't address the problem - reproduction).

Throughout the letter, the issue of humaneness keeps surfacing. That is good. So, let's look, however briefly, at BLMs own data for the effects of round ups and removals. In 2010, BLM provided the data for the round up and removal of 1,132 horses. Of those, 27 or 2.3% died from round-up related activity; another 71, or 6.2%, died from "non-round up related activity (not explained). It matters not if you use 2.3% or 6.2% or 8.3%; that compares with 0% with fertility control, over 28 years.

Fertility control is not the silver bullet. It cannot solve all the problems and end all round ups and removals. It can in some cites and in others it can reduce the frequency of round ups and the number of horses that have to be removed. I will provide the data on the 16th that supports this conclusion. The larger problem here, is one common to advocates on both sides of the table regarding wild horse management. Will we base our decisions about management on the basis of the "best available science" as prescribed by law, or will we founder through opinions, observations, and unsupported generalizations and twenty years from now be in the same boat?

Finally, my understanding is that I am coming to Elko to explain how at least some of the horses can be managed through remote treatment with native PZP. I am not advocating anything, but rather just providing information, but I am certainly not advocating CTR as has been practiced.

You may share this with any members of the RAC, as long as they understand the context for the response .



NATIONAL SYSTEM OF PUBLIC LANDS

Bureau of Land Management Nevada State Office

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Herd Management Area
District Boundary
Interstate Freeway
US Highway

N

0 25 50 75 100 Miles

May 9, 2009