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U.S. House of Representatives
Committee on Natural Resources
Washington, DC 20515

July 9, 2008

JAMES H. ZOIA
CHIEF OF STAFF

Mr. Henri Bisson
Deputy Director of Operations
Bureau of Land Management
Department of the Interior
1849 C St, NW
Washington, DC 20240

Deputy Director Bisson:

It has come to our attention that you recently advised the National Wild Horse and Burro Advisory Board that BLM is considering two options to deal with populations of wild horses on the range and in holding pens – euthanasia or stopping the roundups of wild horses – in an effort to moderate agency expenditures under the program. It is also our understanding that the Board will consider these options at its next meeting in September.

As you know, in June of 2007 we requested that the Government Accountability Office (GAO) conduct a comprehensive review of the BLM's management of wild horse and burros on public lands. We did this because of continued concern that this program is being mismanaged, because we felt the BLM did little to address concerns raised by a 1990 GAO report, and because of recent changes to the Act in 2004.

The report is due to be completed in September of 2008. **In the interim we strongly urge you to refrain from any further action until the report is released and the BLM, the Advisory Board and the Congress has time to review the GAO's findings.**

You may be aware that the BLM's inability to administer the budget of the Wild Horses and Burros program with any trace of fiscal accountability is a long-standing concern and must not be used as a death sentence upon these celebrated symbols of the American West. For instance, the 1990 GAO report – "*Rangeland Management: Improvements Needed in Federal Wild Horse Program*" (GAO/RCED-90-110) – found that the BLM lacked the data to even determine the number of wild horses that the range can support and thus the number to be removed.

Yet, the BLM continued with an aggressive roundup regime that has now placed almost one-half of the wild horse population in holding pens.

Pending the completion of the latest GAO report, and prior to your taking any further actions regarding this program that could be viewed as arbitrary and capricious, we would ask the BLM to respond to the following:

- 1) The BLM states that the "appropriate management level" (AMLs) of wild horses and burros on public rangelands is 27,300 horses. What scientific data is used to determine that number?
- 2) What are the actual numbers of wild horses and burros on public lands? How are those numbers determined, and what is the scientific basis for the census methods in use?
- 3) What is the total acreage managed by the BLM for wild horses and burros?
- 4) It has been reported that over 19 million acres of land, on which wild horses and burros existed at the time of the passage of the *Wild Free-Roaming Horse and Burro Act in 1971*, is no longer available for wild horse and burros. Is this figure accurate? If so, what is the justification for terminating wild horse and burro use of these lands?
- 5) Why has the BLM not reintroduced wild horses/burros to lands that previously were available to the animals in 1971, which have subsequently been closed to their use?
- 6) To what extent has the BLM pursued land acquisitions, exchanges, conservation easements and voluntary grazing buyouts in both checkerboard and non-checkerboard areas to accommodate the needs of wild horses?
- 7) A 1982 National Academy of Sciences report urged the BLM to use PZP immunocontraception (PZP), finding it to be an effective and proactive method for managing horse populations. A 2004 Interior Report by the US Geological Survey found PZP reduced the overall costs of wild horse management. In 2006, the BLM signed a Memorandum of Agreement with the Humane Society of United States to begin working together on promoting PZP. To what extent is PZP being used by the BLM? And what percentage of the BLM budget has been devoted to contraception in any given year or annually?
- 8) What is the ratio of horses the agency has contracepted and put back on the range versus those taken off for adoption or long term holding? Specifically, in which herds has contraception been administered? When was it used? What were the results?

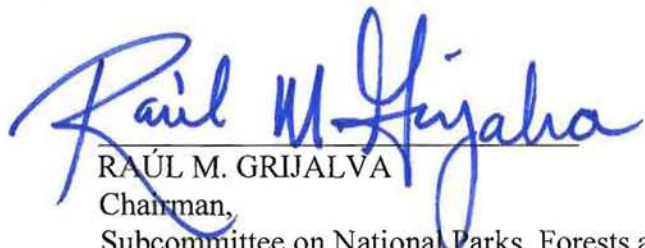
- 9) For at least the past five years, the BLM has been aware of the soft market for the adoption of wild horses, and of its inability to meet its adoption goals. Yet, the BLM still continued to remove twice the number of horses than was conducive to finding adoptive homes -- according to their own estimates. Knowing that the BLM was unlikely to receive a significant increase in its budget for this program, what was the management plan for disposing of these animals, absent euthanasia?
- 10) The BLM has relied heavily in the last eight years on long term holding facilities for horses which the BLM aggressively removed but could not adopt out; and the BLM continued to add to these facilities despite the fact that they were aware of the increasing costs and shrinking budgets. What was the long term plan for their care given rising costs, absent euthanasia?
- 11) The potential for wholesale killing of thousands of healthy wild horses marks a complete turnaround in management policy. Although it is a legally available option, it has never been used in the history of this 37-year old Act. Shouldn't such a major action on the part of the BLM warrant a NEPA decision-making process?
- 12) How would you intend to "euthanize" these horses if that option is chosen?
- 13) Would there be live transportation involved prior to the killing, or will horses be killed on the range or at the holding pens? Would the agency intend to allow for commercial sale of the carcasses?
- 14) Would the public be allowed to view the killings to ensure they are humane?
- 15) What is the cost of mass euthanasia, including disposal of the carcasses?

Again, we strongly urge you to refrain from any further action until we have important information on the BLM's implementation of the program in hand. Only then can we move forward in a more informed, open and deliberate way, and with input from all those concerned with the health, well being, and conservation of this venerable animal which embodies the spirit of our American West.

Sincerely,



NICK J. RAHALL, II
Chairman
Committee on Natural Resources



RAÚL M. GRIJALVA
Chairman,
Subcommittee on National Parks, Forests and
Public Lands