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November 24, 2009

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Ken Salazar
Secretary of the Interior
US Department of the Interior
1849 C Street NW
Washington, D.C. 20240

Dear Secretary Salazar,

In recent months, we have had multiple meetings with senior officials at the Department of the Interior (DOI) and the Bureau of Land Management (BLM) about the problems associated with the BLM's management of the wild horse and burro program, and listened intently as the new leadership at BLM promised a new course of action.

As you know, this past October, DOI released its much-anticipated comprehensive, five-year strategy plan to transform the wild horse and burro program from one that is often inefficient, costly, and inhumane to one which is technologically advanced, fiscally sound, and more humane. The new approaches described by BLM director Bob Abbey and you, while still causing some concern, provided reason for optimism that BLM would finally embrace a new strategic direction for a federal program that has been woefully mismanaged for decades.

Among the initiatives included in your new plan was a shift of the current management approach that relies largely on horse removal and adoption (but that is challenged by the limited adoption demand) to the application of new on-the-range management activities such as the expansion of fertility control programs, the strategic manipulation of sex ratios, and the release of non-reproducing herds onto existing Herd Management Areas (HMAs). We were pleased to see that BLM plans to use fertility control to treat and release 1,500 mares this year¹ – a substantial increase from the previous year when BLM only treated and released 175 mares.

Given that the Congress provided the program with a 30%² budget increase (from \$41 million to \$67 million), we had hoped to see a major realignment towards this

¹ Bureau of Land Management 2010 Budget Justification, "...the program will significantly increase its fertility control efforts...1,500 mares would be treated with fertility control and returned to the range..." (Page III – 77)

² Bureau of Land Management 2010 Budget Justification, "the request for the Wild Horse and Burro Program is \$67,486,00, a \$26.5 million program increase over the 2009 Enacted funding level." (Page III – 73)

new management approach in the agency's FY 2010 budget justification and gather schedule. However, much to our dismay, instead of using the majority of the increased funds to move in a new and more effective direction, it appears that the agency intends to continue the same, short-sighted management policies and procedures that have led to the current broken program and fiscal crisis and that virtually guarantees another fiscal crisis in a year or two.

The gather schedule for FY 2010 shows that the BLM plans to remove more than 12,000 additional wild horses from the range next year³. However, the plan predicts that only around 3,000 of these horses will be adopted. Therefore, the FY 2010 budget justification further indicates that BLM intends to place those 9,000 or so horses it is unable to adopt into half a dozen new long-term holding pastures. Should the BLM proceed with its plans, by the end of FY 2010, there will be more wild horses in holding facilities (i.e. 40,000⁴) than there are on the range (~ 23,000).

Needless to say, there is a conspicuous lack of agreement between BLM's Five Year Strategic Plan and the FY 2010 budget justification. The strategic plan calls for more on-the-range management while the budget justification continues the failed program of gathers, removals, and funding for additional long-term holding pastures with no increase for herd management efforts on the range. No single example illustrates the BLM's contradictory impulses more clearly than the gathers the agency has planned for the Calico Complex, set to start next month. According to the Environmental Assessment (EA), the last gather at the Calico Complex occurred in the winter of 2004-2005 when 2,033 wild horses were gathered, 1,623 removed, and 410 released back to the range.⁵ Following the gather, an estimated 575 wild horses remained in the HMA.

Now, four years later, the agency claims there are now over 3,100 animals on the range and it proposes to remove over 2,800 leaving fewer than 400 individuals on the range.⁶ The EA goes on to state that if gather efficiency this year is less than 80%, the BLM will not even implement the use of fertility control to keep the population from rebounding again four years from now⁷. This is exactly the gather-and-removal

³ 2010 Gather Schedule (This gather schedule is subject to change) 9/15/09

⁴ Bureau of Land Management 2010 Budget Justification (Page III – 76)

⁵ Preliminary Environmental Assessment, DOI-BLM-NV-W030-2010-0001-EA; Calico Mountains Complex Wild Horse Capture Plan (Page 2)

⁶ Preliminary Environmental Assessment, DOI-BLM-NV-W030-2010-0001-EA; Calico Mountains Complex Wild Horse Capture Plan (Page 3)

⁷ Preliminary Environmental Assessment, DOI-BLM-NV-W030-2010-0001-EA; Calico Mountains Complex Wild Horse Capture Plan (Page 3)

treadmill that the Five-Year Plan is supposed to stop, yet it appears to be business as usual with this animal care and fiscal disaster.

Clearly, the management plan for the Calico Complex and many of the other HMAs on BLM's gather schedule for FY 2010 does not demonstrate the kind of change and progress that The HSUS, legislators, and others have been advocating for and that were expected from the new strategic plan.

For these reasons, we respectfully request that the Department of Interior place an immediate moratorium on the gathers scheduled to begin at the Calico Complex next month until we can meet with you and your staff to present the new economic model for wild horse management that The HSUS has developed. Preliminary runs of the model have indicated that on-the-range management is even more cost effective than we have been arguing. We believe this state-of-the-art model will prove to be an indispensable tool that will allow the BLM to design and implement long-term, humane and fiscally responsible on-the-range management plans that will quickly fulfill one of the Five-Year Strategy Plan's most important objectives – to balance population growth rates and adoption demand.

We look forward to your response to our request.

Respectfully,

A handwritten signature in black ink that reads "Wayne Pacelle". The signature is written in a cursive, flowing style.

Wayne Pacelle
President & CEO

cc: Mr. David Hayes
Mr. Robert Abbey
Ms. Sylvia Baca
The Honorable Dianne Feinstein
The Honorable Norm Dicks