



web: www.uscattlemen.org ~ email: usca@uscattlemen.org

February 1, 2016

Lisa Grant
Rangeland Management Specialist
BLM Burns District Office
28910 Hwy 20 West
Hines, OR 97738

RE: NEPA #DOI-BLM-ORWA-B000-2015-0055-EA Mare Sterilization Research

Dear Ms. Grant,

The United States Cattlemen's Association (USCA) respectfully submits the following comments regarding the proposed Mare Sterilization Research project at the Bureau of Land Management's (BLM) Oregon Wild Horse Corral Facility in Hines, Oregon.

USCA represents a national membership of cow-calf producers, backgrounders and feedlot operators whose mission is to present an effective voice for the United States cattle industry.

Current estimates state that over 100,000 wild horses are under BLM jurisdiction, with almost half of those horses residing in permanent, long-term, federal holding pens.¹ Wild horses devastate ecosystems by overgrazing public and private lands, damaging riparian areas, and polluting pristine Western waters. Herd Management Areas (HMA) are grossly overpopulated, forcing many wild horse herds to seek space in non-HMA locations. Improper and inactive management often results in poor horse health, compromises habitat conservation efforts, and costs millions of dollars of taxpayer money to remedy.

Given the current situation, USCA welcomes new policies and ideas to appropriately and actively manage wild horses and burros. However, USCA has numerous concerns with the likelihood of this particular research project leading to a successful method of managing excess horses and burros on public and private lands.

Those concerns are as follows:

Tubal ligation and hysteroscopically-guided laser ablation procedures appear to be the least abrasive technique in the EA; and therefore, are the most likely to be supported by the public. However, this option is limited in its scope of application. The Hysteroscopically-guided Laser Ablation Study is applicable only to open (non-pregnant) mares, therefore greatly reducing the number of animals eligible for the procedure.² Wild horses tend to be exceptionally fertile; therefore, the likelihood of gathering an adequate amount of open mares, out of any HMA, is relatively small. Further, cost estimates for the

1. Gorrey, T., & Lutterman, J. (2016, January 12). *Wild Horse and Burro Quick Facts*. Retrieved January 25, 2016, from http://www.blm.gov/wo/st/en/prog/whbprogram/history_and_facts/quick_facts.html

2. *United States Department of the Interior Bureau of Land Management, Burns District Office, Mare Sterilization Research Environmental Assessment*. (2016, January 5). Page 24

procedure are under estimated in the assessment. Hysteroscopically-guided laser ablation is expected to cost the least amount of taxpayer dollars at \$75-\$125 per head. Ovariectomy via colpotomy is expected to cost the most, at approximately \$250-\$300 per head.³ Unfortunately, in order to conduct this procedure at a level that would curb population growth, an inordinate amount of indirect costs not evaluated in this EA would need to be calculated into the final cost to taxpayers. Sites across the West would need to be built and properly staffed to apply the procedure to the greatest number of animals possible; consequently, the number of staff and veterinarians needed would grow exponentially as a result.

Tubal Ligation

According to the EA, this procedure is intended to be used on pregnant mares. While this serves as a contrast to the above procedure, it is still not without major concerns. Once again, indirect costs associated with this procedure are not accurately evaluated, especially considering possible complications and pain associated with this procedure including abdominal pain (colic) associated with the expansion of the abdomen.⁴ The description of this type of procedure leaves serious doubts as to the amount of horses that can be performed upon per hour. Additionally, the question remains whether the ovaries can even be reached during the procedure due to uterus movement of a late term mare. Similar to the hysteroscopically-guided laser ablation, this procedure is limited in the number of eligible mares, resulting in a significantly smaller impact on controlling the epidemic of excess horses throughout most HMAs.

Ovariectomy via Colpotomy

This procedure, as outlined in the EA, appears to be the least humane of the three methods proposed. Individual mares selected for inclusion in the ovariectomy procedure would be held without feed for 36 hours prior to surgery. As hindgut herbivores, horses are designed to be foragers. Withholding feed for 36 hours can cause undue stress on the individual mare and increase the risk of painful abdominal pain, or colic, which can result in fatality.⁵ Ovariectomy via colpotomy suggests that mares be kept standing for 48- hours after the surgery is completed. Due to the inherent nature of wild horses, USCA has serious doubts that this task can be properly carried out to ensure a successful operation. Because of the perceived inability to keep wild horses standing for up to 48 hours, we would expect the mortality rate to be much higher than cited in the EA. Additional post-operative complications include pain, colic, pawing, refusal to eat, bleeding, infection, or signs of abortion.

There is a lack of clarity presented in the EA on the ability to conduct this surgery on a larger scale. For a group of 100 horses, the EA anticipates a timeframe of 3 to 4 days to complete all of the procedures. With an ever-increasing number of wild horses and burros on public and private lands, a more timely solution is necessary.

Conclusion

3. United States Department of the Interior Bureau of Land Management, Burns District Office, Mare Sterilization Research Environmental Assessment. (2016, January 5). Page 46

4. United States Department of the Interior Bureau of Land Management, Burns District Office, Mare Sterilization Research Environmental Assessment. (2016, January 5). Page 21

5. Nutrena: Knowledge Center - Horse - Nutrition & Care - Colic in Horses. (n.d.). Retrieved January 25, 2016, from <http://www.nutrenaworld.com/knowledge-center/horse/horse-nutrition-tools/colic-in-horses/index.htm>

USCA does not believe that any of the three proposed research procedures will serve to curb the exponential increase in wild horse populations. USCA recognizes the BLM's constructive efforts to find solutions to the dire situation we currently face, but does not support the methods proposed in this EA as a means by which to address the problem at hand.

These proposed procedures come at significant cost and will take years to develop and implement across the west in order to see actual results in reduced herd sizes. This particular study examines approximately 200 mares at a cost of \$400,000 to simply house and feed the animals, with an additional \$60,000 - \$70,000 in surgical procedure costs. USCA believes that the costs described in this EA do not factor in the potential future costs of implementing any of the three proposed sterilization methods on a larger scale. In order for any population control measure to be successful, it would need to be performed upon close to 40,000 free-roaming mares. The cost to sterilize that number of mares could reach up to \$140 million in surgical fees alone. In addition, there are a multitude of associated costs not included in the EA. For example, post-operative care of the mares is not factored into the overall cost assessment in the EA. Mares who receive the sterilization procedure are at risk of many post-operation complications, resulting in the potential administration of costly pain medications and veterinary care. USCA requests a reassessment of the associated costs of this study, and its implication on a larger scale.

With wild horse populations already greatly exceeding numbers set forth in the *Wild Free Roaming Horses and Burros Act*, and continually increasing at a rate of 18% annually, solutions need to be practical and fast.⁶ USCA continues to support BLM efforts to gather wild horses and humanely euthanize excess wild horses as called for in the *Wild Free Roaming Horses and Burros Act*.⁷ Understandably, this solution may not be the most popular alternative, but it serves as the only truly humane and fiscally responsible way to rein in current excess over Appropriate Management Levels (AML). Our public lands and natural resources are degrading as this issue is left unchecked; a balance must be restored on the management of federal lands for multiple uses.

USCA welcomes your feedback and comments to the concerns listed above. Please contact the USCA office at [202-546-4064](tel:202-546-4064) for further information or clarification regarding any of the above stated concerns.

Regards,



Danni Beer
President
United States Cattlemen's Association

6. *Population dynamics of feral horses in Western North America*, Wolfe, Michael L., *Journal of Equine Veterinary Science*, Volume 6, Issue 5, 231 – 235

7. *Public Act 92-195*, 92 Cong. (1971) (enacted).

http://www.blm.gov/pgdata/etc/medialib/blm/wo/Planning_and_Renewable_Resources/wild_horses_and_burros/sale_authority.Par.69801.File.dat/whbact_1971.pdf