

Report to Congress – Bureau of Land Management

Statistics on Wild Horses and Burros

It must be understood that population numbers below are estimates. No one can ascertain for sure how many horses and burros were present in 1971. The first recorded count in 1974 was nearly 60,000 animals.

Because of limited technology at that time and because many counts were visual-one-time assessments, animal counts could have been undercounted as much as 50%.

*All information in red is historical annotations from the author, ISPMB
International Society for the Protection of Mustangs and Burros.*

POPULATION ESTIMATE: FOREST SERVICE (FS)/BUREAU OF LAND MANAGEMENT (BLM)

All statistics gathered for this report come from BLM's Reports' to Congress

- 1980: 55,400 wild horses (estimate)
12,400 wild burros (estimate)

- 1982: 47,824 wild horses
12,280 wild burros

- 1984: 50,380 wild horses
11,641 wild burros

- 1985: 66,000 animals

- 1986: 50,421 BLM animals + 1,875 on FS (below is the breakdown)
42,756 wild horses BLM lands
7,665 wild burros BLM lands
1,525 wild horses FS lands
350 wild burros FS lands

- 1988: 43,286 horses and burros BLM lands
1,621 horses and burros FS lands

- 1989: 41,774 wild horses on BLM lands
4,775 wild burros on BLM lands

1,443 wild horses on FS lands
432 wild burros on FS lands

1990: 2,410 wild horses on FS lands
432 wild burros on FS lands

1991: 50,700 animals on BLM lands (estimate)
2,100 animals on FS lands

44,080 wild horses on BLM lands
6,617 wild burros on BLM lands

1992: 44,080 wild horses on BLM lands
6,617 wild burros on BLM lands

2,265 wild horses on FS lands
254 wild burros on FS lands

1994: 38,962 wild horses on BLM lands
7,500 wild burros on BLM lands

1,471 wild horses on FS lands
191 wild burros on FS lands

1996: 35,588 wild horses on BLM lands
8,005 wild burros on BLM lands

1,757 wild horses on FS lands
193 wild burros on FS lands

2019: 88,000 animals (estimate)

Please note that the BLM historical records department could not produce Reports to Congress from years 1998 through 2015. These reports are required by the 1971 Wild Horses and Burros Act – PL92-195. Unless they can be found, the BLM and FS are in violation of the Act. All information in black has been obtained through the Reports to Congress or BLM's website.

The terminology in the 1971 Wild Horses and Burros Act (PL-92-195) (Future reference – The Act) for “Range” was changed by the Bureau of Land Management (BLM) to Herd Areas (HAs). The term was further diminished by separating out Herd Management Areas (HMAs) within the HAs. BLM indicated for many reasons why animals would not have the full right to roam in their HAs but only in the determined HMAs. If animals strayed out of their HMAs, the BLM then removed them, even if they were within their HAs. This further reduced millions of acres of where wild horses and burros still have the RIGHT to roam as prescribed by The Act.

SEC 2. (C) “range” means the amount of land necessary to sustain an existing herd or herds of wild free-roaming horses and burros, which does not exceed their known territorial limits, and which is devoted principally but not necessarily exclusively to their welfare in keeping with multiple-use management concept for the public lands;

Currently BLM manages 244.4 million acres. FS manages 192.9 million acres.
Wild horses and burros occupy only 19% BLM lands and only 1% FS lands

ACRES WHERE WILD HORSES AND BURROS ROAM:

	BLM	FS
1982:	47 Million (175 Million)	1,934,262
1984:	47,495,879	1,928,562
1985:	34,903,228	2,015,620
1990:	33,649,723	
1991:	34,092,902	2,080,216
1995:	33,170,460	2,094,179
2018:	26,900,000	

Since 1971, wild horses and burros have been permanently removed from nearly half of their rightful ranges (42%).

This was another way to eliminate wild horses and burros.

1980 BLM DESIGNATED HERD MANAGEMENT AREAS (HMAs) FROM HERD AREAS(HAs)

1982:	303 HAs (estimated original number)	51 Territories
1983:	303	47
1985:	257	45
1986:	199	43
1990:	195	
1991:	196	36
1995:	186	36
2019:	177	

ADOPTIONS and REMOVALS: Wild Horses/Burros

Cumulative Adoptions from 1973

1970-80:	20,209		20,209
1981:			35,065
1982-1983:	9,248 wild horses	3,177 wild burros	46,013

1984 regulation changes were proposed by the BLM to circumvent PRIA (Public Rangelands Improvement Act). BLM removed 40,000 wild horses from their rightful ranges before the regulation was dropped. The impetus for removal was to show Congress the large numbers of horses in holding pens. The BLM wanted “sale authority” written into the 1985 Range Omnibus bill but it was defeated in Committee. This would have gutted the protections for wild horses and burros against slaughter.

Fee-waiver program began – illegal program – Allowing adopters to take 100 horses & fee was waived

With 40,000 wild horses in holding pens at tax-payer’s expense, BLM created another regulation known as Fee-Waiver. This allowed the sale of 100 wild horses to anyone and the fee was waived. Ranchers took this opportunity and it is estimated that 16,000 wild horses were slaughtered at the end of the year.

The BLM ended these mass adoptions (Fee-Waiver program) after they lost a lawsuit and were forced to find other alternatives for adoption. This led to prison training programs and private sanctuaries.

1984:	5,500 horses/burros adopted (8% increase over previous year) (600 deaths during capture)	
1985:	18,959 BLM 139 FS (of which 2,600 died during capture) Estimate 9,500 adopted	
1986:	10,126 wild horses/burros BLM lands 147 animals removed from FS lands	60,811
1987:	11,521 animals removed from BLM lands 177 animals removed from FS lands	81,187
1988:	Fee-waiver program ends in September-20,000 animals placed (16,000 estimated went to slaughter)	
1988:	10,027 wild horses adopted (half of the adoptions were fee-waivered) 963 wild burros adopted	
1989:	4,325 wild horses adopted (1,770 wild horses were trained by inmates) 895 wild burros adopted	

ADOPTIONS AND REMOVALS cont.**Cumulative Adoptions cont.**

1990:	4,451 wild horses removed 595 wild burros removed	3,597 adopted 627 adopted
1991:	6,395 wild horses removed 613 wild burros removed	5,307 adopted 660 adopted
1990-91:	10,200 adopted (<i>2,000 trained by inmates</i>) Note above totals are 12,054	
1992:	7,312 wild horses adopted 783 wild burros adopted	
1993:	6,103 wild horses adopted 1,148 wild burros adopted	
1994:	6,810 wild horses adopted 1,057 wild burros adopted	
1995:	7,706 wild horses adopted 1,949 wild burros adopted	
1992-95	32,362 animals were removed	
2001:	13,277 animals removed 7,392 animals adopted	
2002:	12,029 animals removed 7,734 animals adopted	
2003:	10,081 animals removed 6,119 animals adopted	
2004:	10,583 animals removed 7,600 animals adopted	
2005:	11,427 animals removed 7,600 animals adopted	
2006:	8,000 animals removed 7,600 animals adopted	
2007:	5,000 animals removed 7,600 animals adopted	
2008:	5,000 animals removed 7,600 animals adopted	

ADOPTIONS AND REMOVALS cont.**Cumulative Adoptions cont.**

2010:	10,255 animals removed 3,074 animals adopted	
2011:	8,877 animals removed 2,844 animals adopted	
2012:	8,255 animals removed 2,583 animals adopted	
2013:	4,196 animals removed 2,311 animals adopted	
2014:	1,857 animals removed 2,135 animals adopted	
2015:	3,819 animals removed 2,631 animals adopted	
2016:	3,320 animals removed 2,912 animals adopted	
2017:	4,209 animals removed 3,602 animals adopted	
2018:	3,157 animals adopted	
2019:	5,130 animals adopted	
2020:	4,713 animals adopted	240,000

In BLM’s continuing strategy and lack of understanding how to manage wild horses and burros, large removals continue that don’t meet the adoption demand. Holding pastures fill up with the intent to show Congress the need to change the law and continue to push for “sale authority,” sale for slaughter.

Please note below that more than half the BLM’s budget is for warehousing wild horses that should have been left on public lands.

LONG-TERM MAINTENANCE OF WILD HORSES

COSTS INCURRED

1984-85:	2,000-3,000 animals	
1986:	9,900 animals	\$22,000 daily
1985:		\$5.6 million (estimated)
1986:		\$9.5 million (estimated)
1987:		\$8 million (estimated)
1988:	5,500 animals	\$7.5 million (estimated)
1989:	800 animals	
1991:	3,000-3,700 animals	
2004:		\$19,256,986
2005:		\$20,100,000
2007:		\$20,754,000 (55% of the budget)
2008:		\$27,492,000 (59% of the budget)
2009:		\$27,666,000 (62% of the budget)
2010:	34,979	\$31,088,000 (55% of the budget)
2011:	40,589	\$36,290,000 (55% of the budget)
2012:	46,429	\$43,279,000 (61% of the budget)
2013:	49,687	\$47,531,000 (64% of the budget)
2014:	48,179	\$43,623,000 (64% of the budget)
2015:	47,545	\$52,552,000 (70% of the budget)
2016:	45,661	\$49,428,000 (63% of the budget)
2017:	43,813	\$47,536,000 (58% of the budget)

PROGRAM COSTS: BLM

FS

1972:	Zero
1973:	\$400,000
1974:	\$687,123
1975:	\$1,314,306
1976:	\$1,71,833
1977:	\$2,679,000
1978:	\$4,025,000	\$200,000
1979:	\$4,250,000	\$435,000 (\$300/animal)
1980:	\$6,244,274	\$450,00
1981:	\$7,060,000	\$400,000
1982:	\$5,363,000	\$310,000
1983:	\$4,877,000	\$570,000
1984:	\$5,766,000	\$293,000

1985:	\$17,039,000	\$175,000
1986:	\$16,234,000	\$262,000
1987:	\$17,936,000	\$280,000
1988:	\$14,774,000	\$286,000
1989:	\$14,560,000	\$181,000
1990:	\$13,598,000	\$183,000
1991:	\$14,341,000	\$220,000
1992:	\$15,980,000	\$216,000
1993:	\$16,020,000	\$401,000
1994:	\$16,952,000	\$794,000
1995:	\$16,920,000	
2005:	\$39,062,000	
2007:	\$37,743,000	
2008:	\$46,585,000	
2009:	\$44,926,000	
2010:	\$56,596,000	
2011:	\$65,812,000	
2012:	\$70,713,000	
2013:	\$74,604,000	
2014:	\$67,923,000	
2015:	\$75,147,000	
2016:	\$78,298,000	
2017:	\$81,475,000	

REMOVAL COSTS:

INCLUDING REMOVAL, ADOPTION, COMPLIANCE, TITLE TRANSFER

1981:	\$3,938,000	\$1,766,000
1982:	\$4,180,000	\$1,238,000
1983:	\$4,154,000	\$713,000 (Research ending)
1985:	\$13,226,000	\$3,673,000
1986:	\$12,954,000	\$3,276,000
1987:	\$14,526,000	\$3,394,000
1988:	\$13,155,000	\$3,175,000
1989:	\$10,594,000	\$4,303,000
1990:	\$10,033,000	\$4,203,000
1991:	\$10,966,000	\$5,007,000
1992:	\$8,859,000	\$5,717,000
1993:	\$9,314,000	\$6,613,000
1994:	\$8,986,000	\$7,582,000
1995:	\$9,847,000	\$6,674,000

*** PROGRAM COSTS:** INCLUDING RESEARCH
MONITOR/INVENTORY, MGM PLANS, IMPROVE RANGE

REMOVAL COSTS:

GATHER AND REMOVAL ONLY

2001:	\$6,200,000
2002:	\$5,500,000
2003:	\$4,700,000
2004:	\$4,900,000

2005: \$5,400,000
2006: \$3,800,000
2007: \$2,400,000
2008: \$2,500,000

BLM CONTINUES TO IGNORE THE ACT

The Act is one of several strong environmental laws that passed in the late 60s to early 70s.

Please note the above financial figures which show the vast difference between Program Costs and Removal Costs. In the Program Costs along with other items is housed the monitoring and inventorying data. The monitoring of habitat data is germane and vital to the Wild Horse and Burro program.

Yet, in one analyzed figure in 2004, only 4% of the BLM's budget went to monitoring the habitat. Yet, this is an agency that is known as a "land manager."

The reason that this is so important is that NO wild horses or burros can be removed unless monitoring of the habitat shows "excess."

Excess is defined by The Act as "those animals removed in order to preserve and maintain a thriving ecological balance and multiple use relationship in the area or pursuant to other applicable law."

Without monitoring data, BLM cannot determine "excess" and therefore, cannot legally remove animals. Further, BLM must determine what animals are causing damage and only those animals must be removed to maintain a thriving ecological balance. Those animals also include livestock and wildlife.

Note that livestock are in almost all of the HMAs where wild horses and burros reside. The ratio is as high as 100 (livestock) to 1 (horse/burro) in many areas.

BLM is not allowed by law to pick arbitrary and capricious numbers to manage wild horses and burros known as Appropriate Management Levels (AMLs). They have arbitrarily chosen 26,715 animals to reside on the remaining HMAs.

Authenticating the above ruling about arbitrarily establishing AML was noted in the Interior Board of Land Appeals (IBLA) rulings in 1989 brought by Animal Protection Institute (API). The IBLA rulings stopped all wild horse and burro removals until 1992 at which time the BLM defied the rule. This would have required API to go to federal court.

Without habitat monitoring and determining what animals are causing damage such as cattle, etc., AML cannot ever be established. BLM sets AML by numbers and removes animals

when they have reached their peak numbers – never basing the removal on determining “excess” by monitoring the habitat.

This has resulted in unnecessary removals of wild horses and burros and no improvement of habitat. This was also noted in the 1990 Government Accountability Office (GAO) report in which they stated that removal of wild horses would not improve habitat unless there were removals of the same percent of livestock.

ISPMB presents the following report and proposal to the Secretary of Agriculture which would change how the BLM and FS manage wild horses and burros. This would be in compliance with The Act of “minimal feasible management” saving tax-payers millions of dollars, preserving the habitat and most importantly preserving healthy social behaviors of wild horses and burros leaving viable numbers of animals so future generations of Americans can enjoy seeing them in the wild as wild.

Make the Heber Herd of northern Arizona a Study Herd over the next 5-7 years which can transform how wild horses and burros should be managed. The following report has three critical areas of focus:

- 1. There must be a “New Management Model” implemented for wild horses and burros*
- 2. The BLM and FS must abide by the Act in determining “excess” animals which is the only lawful reason for removal. They have not done so since 1992*
- 3. ISPMB requests of the Honorable Tom Vilsack to declare the Heber Wild Horses in the Apache-Sitgreaves Forest of Arizona to be studied over the next several years creating a NEW Model for Management*