

Sheldon National Wildlife Refuge Horses Need Your Help

The FWS has gone to great lengths within the EA to refute objections raised by animal welfare groups, wildlife conservationists and the general public and to defend their intention to continue reducing the equine population on the refuge to a token herd of 75-125 horses and 30-60 burros from the 1,600 animals that live there today. They further propose to ramp up the removal of horses on a more accelerated schedule, with 600-1,000 horses planned to be harvested this year alone—numbers that will flood an already saturated market for horse adoption.

Your voice is essential, and time is running out. Please write to the U.S Fish & Wildlife Service at sheldon-hart@fws.gov with your objections to their proposed “Alternative B” in the EA. The horses and burros in the refuge are in desperate need of protection.

The EA is Riddled with Flaws, Contradictions and False Premises

The Environmental Assessment only offers two real alternatives under the guise of “four” management options. Alternative A calls for leaving the horse and burro populations intact and ending the program of equine removal. Alternative B, which the FWS recommends, calls for continuing to remove these animals from the refuge in much the same way as the agency has done in the past, but on a stepped up schedule—removing 600-1,000 horses this year alone (out of the 1,600 that currently live in the refuge)—resulting in the target population of 75-125 horses and 30-60 burros achieved within the next three years. There are two other “alternatives” given, but these are merely variations of Alternative B: Alternative C calls for the same reduction in population size, but allowing direct private adoption of the animals rather than paying a few designated agents \$300 per animal to take them all; and Alternative D calls for doing the roundups by horseback only (no helicopters), which would mean the target population objectives would take an extra four years to achieve.

What the EA Says – and Doesn’t Say

1) About horses and burros “degrading” water resources and vegetation

The EA’s allegations that wild horses and burros have degraded the waterways and vegetation in the refuge lack scientific substantiation, and in fact some of these claims are blatantly false. For example, the FWS presents two photos on the cover of the EA and on its website showing Big Spring Creek in August 2004 and the same view a year later in August 2005 after 300 horses had been removed from the refuge. What the FWS doesn’t disclose is that the 2004 photo was taken following six consecutive years of drought. Between the time this photo was taken and Aug. 2005, there was an unprecedented amount of rain in the Sheldon (literally twice the rainfall as the year before), resulting in the unusually lush aspect shown in the 2005 photo. The restoration of this area had everything to do with rainfall and little to do with the removal of horses. The FWS also claims that “Woody vegetation and other responses from the ecosystem [in this area]...will take many years for restoration from the damage” yet there is no proof -- such as tree stumps or any other supporting evidence -- that this was ever an area that would have included “woody vegetation.” The photos clearly show a meadow.

The FWS states that “Monitoring information from 2002 concluded that 44 percent of all streams and 80 percent of the springs on the refuge are heavily or severely degraded by horses.” (EA Section 1.6.2.3) – a statement that’s incorrect and highly misleading, based on the fact that there are 117 miles of perennial streams and springs on the refuge, and the study only sampled 20 miles of them. In fact, the study describes findings at the 20 stream reaches and 16 springs that were monitored as follows: “44 percent received heavy to severe use, 22 percent received light to moderate use and 33 percent had no or only slight use.” (“Managing Feral Horse and Burro Impacts on Habitat,” Section 4.1.1).

It is a fact that wildlife, including pronghorn antelope and mule deer, do some damage to riparian areas. In fact, there are areas within the refuge seldom visited by horses or burros that have suffered damage by antelope and deer, but this point is never acknowledged. Equines tend to use water resources in an orderly and relatively unobtrusive fashion, not like the rout and mess caused by cattle, which in the early 1900s did irreparable damage to many riparian areas on the refuge. Unlike cattle, but very like antelope and deer, horses generally visit a few favored waterways, drink and then leave.

2) About Conflicts between Horses and Other Wildlife.

The FWS uses supposition not science to support the claim that “conflicts between equines and wildlife are numerous” and that “biodiversity will continue to deteriorate” if horses aren’t removed from the refuge. These statements are not supported by any empirical data demonstrating how interspecies conflict has been observed.

The diets of equines vs. other wildlife such as antelope and deer suggest a complementary rather than competitive relationship between these species. Horses graze on grasses; antelope and deer generally do not – they browse for entirely different vegetation. Although bighorn sheep are grazers, they live on cliffs and rocky outcroppings in the Sheldon—a habitat that is separate from the areas favored by horses. Concerning competition for water, the Sheldon is exceptionally rich in water resources in an otherwise arid environment, one of the very reasons it was established as a wildlife refuge in the first place.

It is more likely that the equines play a crucial role in the overall health of the ecosystem and the biodiversity of the Sheldon, and the symbiotic relationships that exist should be studied—not destroyed. Antelope are regularly to be found at a distance following herds of free-roaming horses; it is unknown why they do this – but possibly it’s because they are seeking protection from predators that the larger horse herds afford. Mutually beneficial relationships also exist between the horse family and the grasses on which they graze. The digestive system of equids allows the seeds of many plant species to pass through only partially digested and germinate in the soil. In this way, many plant species have been and continue to be successfully dispersed over large areas in a manner that would otherwise not occur. Because horse feces contain less thoroughly decomposed vegetable matter than ruminants’, they aid in building the nutrient-rich humus component of healthy soils, which in turn leads to better water retention and nutrient level for root absorption.

Wild horses also play an important role in fire management, clearing away excess combustible vegetation that might otherwise create a hazard. Concerning biological integrity and diversity, horses and other wildlife have mutually supported each other for hundreds if not thousands of years.

3) About the Focus of Refuge Management on Protecting Native Wildlife.

The FWS claims that “native fish, wildlife, plants and their habitats are the focus for management of the Refuge” –not “feral” horses and burros. They also note that “the issue as to whether horses and burros are native species and not feral animals is a point that continues to be debated and has been neither proved nor disproved.” (EA Section 1.6.2.3). Regarding this “debate,” proof in the form of mitochondrial DNA does in fact demonstrate that the North American wild horse is an indigenous species, and that North America was the evolutionary birthplace of the horse family. The fact that the Sheldon horses are the descendants of 19th century cavalry mounts “reintroduced” to the area doesn’t make them less native. According to Jay Kirkpatrick, DVM, PhD, Director of the Science and Conservation Center in Billings, Montana,

“The use of the word “feral” is a human construct that has little biological meaning except in transitory behavior. The fact that horses were domesticated before they were reintroduced matters little from a biological viewpoint. They are the same species that originated here, and whether or not they were domesticated is irrelevant. Consider this parallel. *E. Przewalski* (Mongolian wild horse) disappeared from Mongolia a hundred

years ago. It has survived since then in zoos. ... Then they were released a few years back and now repopulate their native range in Mongolia. Are they a reintroduced native species or not? And what is the difference between them and *E. caballus* in North America, except for the time frame and degree of captivity? The key element in describing an animal as a native species is (1) where it originated; and (2) whether or not it co-evolved with its habitat. *E. caballus* did both in North America.”

4) About Wild Horse and Burro Economics.

The FWS acknowledges that its ongoing plan to “manage” (i.e, reduce) the population of wild horses and burros is “very costly.” Alternative A (discontinuing the program of horse and burro removal) would save more than \$3 million in taxpayer dollars. (EA Figure 3, p. 24) Yet the FWS rejects this alternative for the claims stated above and because it would result in “fewer opportunities for the general public to own a horse or burro” as well as result in loss of income for private contractors who are hired to remove the animals from the refuge (EA Section 4.13). The fact is that removing 600-1,000 horses from the refuge this year alone would only have the effect of flooding an already saturated horse adoption market.

5) About Equine Protection under the Wild Horse and Burro Act.

The FWS states that “The vast majority of Sheldon horses are not subject to the Wild Horse and Burro Act” (Section 2.16) yet they acknowledge that some BLM horses which are protected by the Act migrate onto the Sheldon from BLM land. How can the FWS and BLM tell which horses are which?

6) About Treatment of Gathered Horses in the Refuge Corrals

Despite the FWS’ claims of concern for horse welfare, the EA does not include any standards of care or guidelines for the humane treatment of gathered horses once they are brought into the refuge corrals. Problems that have been consistent in the past have included the inability of mares and their foals to pair up, lack of adequate fresh water; the use of substandard and often moldy hay; and the poor technique of releasing select horses back into the refuge simply by opening a corral gate rather than taking them back to their territories sometimes more than 30 miles away (resulting in the horses’ inability to find their way back). Moreover, when numbered necklaces have been used for identification, these have often been left on the horses when they are transported off the refuge, in many cases becoming embedded in the flesh of the younger animals as they grow.

According to the FWS, removing horses “at the fastest rate possible, between 600-1,000 horses per year,” ... “will minimize impacts to horses... and will reduce chances of horse injury and stress, and improve safety concerns to contractors and employees.” (EA Section 2.2, p. 20) It is difficult to imagine how larger numbers of horses thrown together in the Sheldon corrals would reduce the chances of injury and stress to the horses themselves or to any of the contractors or employees working with them. If anything, this would seem a compelling argument for gathering smaller numbers of horses at a time.

7) About Biological Substantiation for the EA’s Recommendations.

Finally, the EA should be questioned because it fails to provide any biological substantiation for the target numbers chosen for an “optimal” population of wild horses and burros in the Sheldon, substantiation required in an environmental assessment by the National Environmental Policy Act. The EA states that “The current program objectives include maintaining a manageable feral horse and burro population in balance with other wildlife species...” yet there is no definition of how this “balance” is determined or how the desired numbers have been derived. Reducing the Sheldon equids to a herd of 75-125 horses and 30-60 burros just doesn’t make sense; these would not be genetically viable herds. They are setting the stage for inbreeding and extinction, for zeroing out these animals completely.

Recommendations

Demand that the FWS provide a detailed long-term management plan to achieve the more realistic objective of target herd numbers of at least 800-1,000 horses and 100-150 burros. A 900-square-mile refuge (575,000 acres) can easily accommodate these numbers. The management plan should at a minimum:

- Include impartial biological substantiation for any proposed herd management levels before spending vast sums of taxpayer money on possibly unnecessary and certainly short-sighted management techniques.
- Allow more “screened adoption agents” who can each take smaller numbers of gathered horses, as well as allow private adoptions by individual members of the public. This is the only way to seriously promote the adoption of the animals to good homes and prevent them from finding their way to slaughter.
- Ensure that gathers will be conducted at times other than the height of the foaling season, which includes the month of June.
- Outline standards and detailed guidelines for the humane treatment of horses once they are gathered and brought into the corrals. These should include:
 1. Specifying the maximum number of horses to be kept in the refuge corrals at any one time to prevent against overcrowding and hazardous conditions;
 2. Making it a priority to allow mares to find their foals;
 3. Providing adequate water and ensuring the purchase and availability of high-quality fresh hay;
 4. Providing for the release of older (un-adoptable) horses back into the refuge to the same territories where they were gathered, and incorporating the use of contraception for older mares who are released;
 5. In cases where numbered necklaces are used for identification, removing these before the horses are transported out of the refuge;
 6. Soliciting volunteers from the public to serve as “compliance officers” who would help ensure accountability for these basic standards of care as well as who would provide adoption follow-up – a practice on par with established BLM standards.