

May 3, 2023

Agriculture, Water & Natural Resources

### **Opposition to SB23-275 (Colorado Wild Horse Project)**

My name is Jennifer Best. I am the Director of Friends of Animals Wildlife Law Program located in Centennial, Colorado. Friends of Animals has a long history of advocating for wild horses, has brought several successful lawsuits against the Bureau of Land Management (BLM) for its mismanagement of wild horses, and has identified ways for better, more humane management of wild horses – SB23-275, the “Colorado Wild Horse Project” is not one of them.

The key to a successful wild horse program is restoring wild horse habitat and mandating transparent, science-based range assessment and management. However, SB23-275 does neither of these and instead places the future of wild horses at risk by supporting BLM’s arbitrary population targets and encouraging fertility control, such as the pesticide, porcine zona pellucida (PZP.).

**SB23-275 perpetuates the mismanagement of wild horses.** There is not an overpopulation of wild horses in Colorado. In fact, there are only about 1,527 left on 365,988 acres of public land managed by the BLM. Nonetheless, BLM continues to spend millions of taxpayer dollars to keep populations at extremely low “appropriate management levels” (AMLs). As the National Academy of Sciences reported in 2013, “[h]ow AMLs are established, monitored, and adjusted is not transparent to stakeholders, supported by scientific information, or amenable to adaptation with new information and environmental and social change.”<sup>1</sup> The report explained, that “it is important to develop and maintain standards for transparency, quality, and equity in the establishment, adjustment, and monitoring of AMLs.”<sup>2</sup>

BLM, who commissioned this report, has never corrected the problem. BLM continues to rely on population targets that predate the National Academy of Sciences Report. Unfortunately, SB23-275 supports the broken system by offering to assist BLM in keeping wild horse populations dangerously low with detrimental fertility controls. The bill would also create the “wild horse project,” a nonprofit, state-owned corporate entity that manages and operates wild horse management programs.

The bill ignores the real problem — BLM has sacrificed the protections Congress afforded wild horses in the Wild Free-Roaming Horses and Burros Act to the meat industry, private landowners and ranchers, and other commercial interests. Of the 245 million acres of

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<sup>1</sup> National Research Council. *Using science to improve the BLM wild horse and burro program: a way forward*. National Academies Press, 2013 at 12.

<sup>2</sup> *Id.* at 255.

public land managed by the BLM, 155 million are open to livestock grazing. By contrast, wild horses are restricted to just 26.9 million acres (which continues to decrease under BLM management), and which they must share with livestock. Upwards of 2 million cattle graze public lands, not to mention millions of sheep, and the government has authorized thousands of oil, gas, and mineral extraction projects in these areas as well. Livestock grazing and mining, not wild horses, are damaging the environment, fragmenting wildlife habitat, and contributing to climate change.

Just look at the livestock grazing permits in the Sand Wash Basin Herd Management Area, where a roundup is slated for September. Only 362 wild horses are allowed to graze there, yet a staggering 12,026 sheep and 300 cattle are allowed to graze in the herd management area. SB23-275 prohibits even considering transferring forage from private industries to wild horses and other wildlife without their agreement of industries using our public lands. Industry should not be allowed to control our public lands.

Moreover, the bill does nothing to help support a healthy, viable population of wild horses on public lands in Colorado. The Equid Specialist Group of the International Union for Conservation of Nature's Species Survival Commission recommends minimum populations of 2,500 individuals for the conservation of genetic diversity. Currently, no single herd management area has a minimal viable population for the long term, nor does the entire wild horse population in the state of Colorado. And it has been shown that healthy wild horse herds are vital to a thriving ecosystem. Unlike domestic cattle and sheep, wild horses can benefit the ecosystem, especially during droughts.<sup>3</sup> Wild horses can dig wells creating oases that serve as a boon to other wildlife. Wild horses help to prevent catastrophic fires and build more moisture-retaining soils. Wild horses also help spread plant seeds over large areas. Wild horses enhance the ecosystem, rather than cause its degradation.

**SB23-275 not only fails to protect Colorado's wild horses, but places them at risk** by encouraging fertility control, such as the pesticide PZP. Research shows PZP can sterilize wild horses after multiple uses and results in risky foal birth out of season. This paves the way for the eradication of wild horses and does not address the root of the problem, namely that the government continues to allow the destruction of wild horse habitat and public lands by factors that are not caused by wild horses.

Thank you for your attention to this issue. Friends of Animals respectfully request that you reject SB23-275, which would only further endanger the future of Colorado's wild horses.

Sincerely,

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<sup>3</sup> See Lundgren, E. J., et al. (2021). Equids engineer desert water availability. *Science*, 372 (6541), 491-495; Downer, C. C. (2014). The horse and burro as positively contributing returned natives in North America. *American Journal of Life Sciences*, 2(1), 5-23; see also Lundgren, E. J., Ramp, D., Ripple, W. J., & Wallach, A. D. (2018). Introduced megafauna are rewilding the Anthropocene. *Ecography*, 41(6), 857-866.