

Congress of the United States

House of Representatives Washington, DC 20515

March 5, 2020

William Perry Pendley Deputy Director, Policy and Programs Bureau of Land Management 1849 C St NW # 5665 Washington, DC 20240

Dear Deputy Director Pendley,

We write regarding the Bureau of Land Management's (BLM) efforts to manage wild horse and burro populations on public lands. As supporters of reversible fertility control as an essential population management tool, we believe implementation of a large-scale reversible fertility control program is vital to the success of a long-term strategy for managing wild populations in a safe, effective, and cost-efficient manner for the animals and the rangeland.

In the FY 20 budget, Congress provided BLM with a \$21 million funding increase for the management of wild horses and burros. Part of that funding was restricted contingent upon BLM providing Congress a report on their management plan for wild horse and burro populations. As Congressional supporters of our free-roaming wild horses and burros, we hope to see this plan turned over expeditiously to the appropriate Congressional Committees. We also hope that BLM's management report will contain significant support for effective, reversible fertility control techniques, which are key scientifically proven tools for the management of equine populations.

BLM has supported research on contraceptive vaccines for wild horses since 1992. For example, BLM's research developed the Porcine Zona Pellucida (PZP) vaccine, which comes in two forms – one of which must be administered every year, Zonastat-H, and a longer lasting form, PZP-22, which could last up to two years. Further, GonaConTM is a GnRH-based immunocontraception vaccine shown to induce infertility for two or more years with a single administration in wild horses, and the reimmunization of previously treated mares resulted in significant reduction in fertility for three or more consecutive years. More testing is needed to demonstrate long-term safety and efficacy in all of these areas. It is well known that to implement an effective fertility control program, the agency must administer vaccines to at least 80 percent of mares to see a population stabilize. Yet in FY 2018, the BLM reported administering only 580 doses of PZP and 110 doses of PZP-22, and only on 16 Herd Management Areas. This level of PZP administration will not help curb national population growth for the more than 80,000 animals currently on the range.

Long-term management of free-roaming wild horses on public lands as prescribed in the 1971 Free-Roaming Wild Horse and Burro Act requires a modern approach. While we support further research into reversible contraceptive vaccines that can be incorporated into BLM's long-term management plans, alternatives to ZonaStat-H, PZP-22 and GonaCon will require years of ongoing testing to be fully evaluated for management usage. Current practices of mass roundup and removal have resulted in compensatory reproduction year after year; BLM must instead start effectively producing and using current fertility control vaccines to better curb population growth.

In order to better understand BLM's management approach for our wild horses and burros, we seek additional information on BLM's intentions for a population control strategy that involves contraceptive vaccines:

- 1. What was BLM's justification to stop execution and funding of ongoing contracts regarding production of reversible fertility control vaccines, such as the 2017 three-year PZP-22 production agreement with the University of Toledo?
- 2. What is BLM's justification to not approve funding for PZP-22 production, or ongoing projects associated with PZP-22, given its effectiveness?^[1]
- 3. What BLM initiatives exist to support research and development of other contraceptives such as GonaCon?
- 4. How much money, in the past five fiscal years, did BLM invest in studies of irreversible fertility control strategies such as sterilization?
- 5. How much money, in the past five fiscal years, did BLM spend on reversible fertility control tools such as PZP, PZP-22 and GonaCon?
- 6. Please provide a detailed plan of how BLM plans to use the \$101,555,000 appropriated for the Wild Horse and Burro Management program in the FY 2020 budget agreement to address the growing number of wild horses and burros on and off the range including details on planned spending for holding facilities and permanent sterilization if possible?

Our united goal, to curb population growth of wild horses and burros through large-scale fertility control program, is the humane approach to animal management and stewardship of our lands. It is imperative we work together to prevent further drastic spikes in populations, and mind common sense fiscal responsibility. Continuing the status quo is not acceptable.

Thank you in advance for your attention to this issue and your ongoing collaboration to find the best solutions to manage wild horse and burro populations moving forward.

United States Department of Interion, Bureau of Land Management. 2019. Science and Research. https://www.blm.gov/programs/wild-horse-and-burro/herd-management/science-and-research

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Chris Stewart Member of Congress

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