

Comments on this document must be received by March 30, 2011, and should be submitted by email to: wildhorse@blm.gov. Please include "Comments on the Strategy" in your email's subject line.

**U.S. Department of the Interior
Bureau of Land Management**

Proposed Strategy

**Details of the BLM's Proposed Strategy for Future
Management of America's Wild Horses and Burros**



February 28, 2011



BLM

Table of Contents

What We Heard from the Public	3
The BLM’s Response	3
Table 1: Summary of Public Comments on the Wild Horse and Burro Program Strategy Development Document (Released June 3, 2010) and the BLM’s Response	4
Other Management Approaches Proposed by the Public	6
The BLM’s Proposed Strategy	7
Sustainable Herds.....	7
Ecotourism	8
Pastures and Partnership Sanctuaries.....	8
Place Excess Animals in Private Care	9
Animal Welfare.....	10
Science and Research.....	11
Public Outreach.....	11
Next Steps	12
Projected Program Costs	12
The BLM’s Proposed Wild Horse and Burro Program Strategy	12
Figure 1: Projected WH&B Population Size (Proposed Management Strategy)	13
Figure 2: Funding Needs and Removal, Holding, and Adoption Numbers.....	13
The BLM’s Current Management Approach.....	14
Figure 3: Projected WH&B Population Size (Current Management Approach).....	14
Figure 4: Funding Needs and Removal, Holding, and Adoption Numbers.....	15
Comparison of the Proposed Strategy and Current Management Approach.....	16
Appendix 1: Detailed Summary of Public Comments on the BLM’s Wild Horse and Burro Program Strategy Development Document (Released June 3, 2010) and the BLM’s Response	18
Appendix 2: Questions and Answers	28

What We Heard from the Public

On June 3, 2010, the BLM released a Wild Horse and Burro Program Strategy Development Document for review and comment. Interested stakeholders were invited to offer their opinions and suggestions about the draft goals, objectives, and possible management actions outlined in this document. In response, the BLM received approximately 9,000 comment letters and e-mails. Key findings include:

- Many Americans continue to be passionate about wild horses and burros and their management.
- While some areas of general agreement were identified, a wide range of viewpoints was expressed on some central issues.
- The public suggested various options for future wild horse and burro management. Each of the suggested management options represents very different choices and outcomes for America's wild horses and burros, and include:
 - Focusing management on a smaller number of Herd Management Areas (HMAs) in the West, managed as wild horse sanctuaries, where wild horses and burros and native wildlife would constitute the principal resources on public lands, consistent with land-health objectives.
 - Reducing the Appropriate Management Level (AML) — the number of wild horses and burros the BLM has determined the land can sustain — or implementing an aggressive population suppression program using the widest possible array of management tools to balance herd population growth with public adoption demand while maintaining other multiple-uses on Western public rangelands, such as wildlife, watershed protection, wilderness, recreation and livestock grazing at current levels.
 - Expanding wild horse and burro use areas to other places on public lands, while allowing natural processes to control population size.

The BLM's Response

Based on the feedback received, the BLM is proposing a new strategy for managing wild horses and burros (see Table 1 - page 4, and Appendix 1 - page 18).

Under the proposed new strategy, the BLM would place greater emphasis on the use of fertility control, including “catch, treat and release” (CTR) gathers, boost adoptions, establish a comprehensive animal welfare program, and call on the National Academy of Sciences (NAS) to review previous wild horse management studies and make recommendations on how the BLM should proceed in light of the latest scientific research. The NAS review is expected to be completed in early 2013.

As the NAS study is carried out, the BLM plans to remove approximately 7,600 excess animals annually from Western public rangelands — down from planned removals of more than 10,000 a year — to keep the overall on-the-range wild horse and burro population between about 32,000 to 36,000 animals during this timeframe. This temporary reduction in gathers will enable the BLM to address other elements of the strategy, such as increasing applications of fertility control, training more wild horses to boost adoptions, and conducting more research.

At the conclusion of the NAS study, the BLM will determine whether there is a need for a comprehensive Environmental Impact Statement (EIS) that would analyze the potential impacts of several wild horse and burro management options — or if changes in Federal law are needed in order to place the Wild Horse and Burro Program on a more sustainable track over the long-term. For example,

the NAS could recommend other science-based approaches for future population management. If these recommended approaches are not in conformance with the BLM's existing Resource Management Plans, amendments to these plans and appropriate National Environmental Policy Act analysis would be required before the changes could be implemented.

Specifically, the proposed new strategy calls for:

- stepping up fertility control, including CTR gathers that are principally aimed at applying PZP fertility-control vaccine to mares (over the current level of about 850 in Fiscal Year 2011), and adjusting herd sex ratios in favor of males to reduce the number of on-the-range pregnancies;
- boosting public adoption demand by offering more trained horses, aiming for more than 4,000 adoptions a year (over the current level of approximately 3,000);
- emphasizing a comprehensive animal welfare program by strengthening internal and external reviews of the BLM's animal care and handling practices;
- promoting wild horse and burro herds through local volunteer efforts and partnerships that could explore herd-related ecotourism possibilities;
- establishing potential public-private wild horse sanctuaries that are cost effective; and
- enhancing public outreach by providing factual, up-to-date information through the BLM's Website and social media, such as Facebook; reorganizing the Website to make information easier to find; and providing various opportunities for the public and media to view wild horses and burros on the range, at gathers, and in short-term corrals or long-term pastures.

The BLM's Proposed Strategy builds on the concepts outlined in the Secretary's October 2009 Initiative that was intended to place the Wild Horse and Burro Program on a more sustainable track. The most notable modifications are: (1) local community support/partnerships and ecotourism elements are emphasized to increase the public's awareness and sense of ownership of all the Herd Management Areas (HMAs) rather than selected Treasured Herds; and (2) partnership sanctuaries will be explored for the cost-effective, long-term care of unadopted wild horses as an alternative to federally acquired "Preserves." As a result, the BLM's request for \$42.5 million in additional funding in FY 2011 to acquire private lands for a federally owned preserve is no longer being considered.

Table 1: Summary of Public Comments on the Wild Horse and Burro Program Strategy Development Document (Released June 3, 2010) and the BLM's Response

Strategic Theme	What We Heard from the Public	The BLM's Response	The BLM's Strategy
Sustainable Herds	Many felt that the BLM's highest priority is to control wild horse and burro population size in order to manage the animals in balance with the land's productive capacity and other resources and uses. There was strong support for the use of	At the conclusion of the NAS review, determine whether there is a need for a comprehensive Environmental Impact Statement (EIS) to analyze the potential impacts of several long-term wild horse and burro management options.	In FY 2012 through about FY 2014, reduce removals from 10,000 to about 7,600 excess animals per year, while addressing other program priorities such as increasing fertility control and boosting adoptions. Priority for gathers

	fertility control to control herd size but disagreement about which method(s) should be used. Others felt that the BLM should rely on natural population controls.		will be in areas where overpopulation most threatens land health, animal welfare, and public health and safety.
Sanctuaries	There was strong support for partnership “sanctuaries.” There was also support for long-term pasture contracts and for the development of Farm Service Agency programs. There was almost no support for Federal acquisition of private lands.	Promote “Pastures and Partnership Sanctuaries.” Revise goal: “Provide for sustainable long-term care of unadopted wild horses in the most cost-effective manner in long-term pastures or partnership sanctuaries.”	Maintain existing long-term pasture capacity, and acquire additional cost-effective capacity as necessary through contracted long-term pastures, or partnership sanctuaries or Farm Service Agency pasture programs.
Place Excess Animals into Private Care	There was strong support for making more trained animals available for adoption and for partnerships.	Offer more trained animals.	Expand private partnerships to train animals without a Federal investment in infrastructure. Explore the Mustang Heritage Foundation’s proposal to adopt out 4,000 wild horses per year and other similar proposals to offer more trained animals. Continue facility adoptions and existing prison, fostering, and other training programs.
Animal Welfare	There was strong support for development and implementation of a comprehensive animal welfare program (CAWP).	Emphasize the importance of a strong “Animal Welfare” program.	Develop and implement an ongoing program of internal and external review of the BLM’s animal care and handling practices.
Science and Research	There was strong support for science and research.	Continue to seek out and use the best science available when making management decisions.	Move forward with the proposed NAS review. Review the National Wild Horse and Burro Advisory Board’s past research recommendations to determine if these proposals were implemented, are no longer relevant, or need to be pursued.
Public Outreach	Many urged the BLM to be more transparent.	Reaffirm throughout the agency a fundamental commitment to transparency in all facets of the wild horse and burro program.	Provide opportunities for the public to view wild horses and burros on the range, at gathers, and in short-term holding. Host an annual or periodic media and public tours of wild horses in long-term pastures. Provide factual and up-to-date information through the BLM’s Website and social media (such as Facebook). Reorganize the Website to make information more accessible.

Other Management Approaches Proposed by the Public

Many of the management approaches suggested by the public would result in the type of changes that would require the BLM to amend existing land use plans (Resource Management Plans, or RMPs) and complete appropriate NEPA analysis before they could be implemented. Changes to existing Federal laws may also be needed. The other management approaches proposed by the public include:

- A suggestion to euthanize or sell, “without limitation,” unadopted wild horses. While humane euthanasia and sale without limitation of healthy horses for which there is no adoption demand is authorized under the WFRHBA, Congress prohibited the use of appropriated funds for this purpose between 1988 and 2004 and again in 2010. This choice reflects the public’s values and passion for America’s wild horses and burros and this option is not under consideration.
- Another suggested management approach was to return unadopted wild horses to Herd Areas (HAs), or to expand the areas of the public lands designated for their use. Decisions to return unadopted horses to HAs would require the BLM to amend existing land use plans and complete appropriate NEPA analysis on a case-by-case basis, or on a national level. Designating lands for wild horse and burro use that are outside the 1971 HA boundaries would require changes to the WFRHBA.
- Some suggested a management approach in which wild horses and burros and wildlife would be the principal use of the public lands, and other uses would be reduced or eliminated. These types of actions would require the BLM to amend existing land use plans in accordance with the NEPA and applicable Federal regulations and could also require changes to Federal law.
- Others suggested a management approach that would rely on the sole use of fertility control to manage wild horse and burro population size (i.e., no further gathers to remove excess animals). Under the Proposed Strategy, the BLM will conduct research into the use of different fertility control agents or other population suppression measures. The goal for this research will be to develop longer-lasting and more effective methods for controlling population size.
- Allowing populations to regulate themselves through starvation, disease or predators to control wild horse and burro population size was also suggested. The BLM has asked the NAS to review the Wild Horse and Burro Program to determine if there is credible scientific evidence that population “self-regulation” and/or predation would be effective in controlling wild horse and burro population size before land and herd health is compromised.
- Another suggested management approach would suspend the use of helicopters to assist in the gather and removal of excess wild horses and burros. The OIG (2010) found that gathers to remove excess wild horses and burros were necessary and humane. A recent review of gather statistics also indicates that gather-related mortality in FY 2010 was limited to less than one-quarter of one percent (0.24%) of the total number captured — which is very low when handling wild animals. Based on the results of these reviews, the BLM will continue to use helicopters to assist in the removal of excess wild horses and burros when it is determined through gather planning that it is the safest, most effective, and most humane manner of doing so.
- Many suggested an immediate gather moratorium until the NAS study is complete. This option is not feasible at this time for several reasons. First, the WFRHBA directs the BLM to gather and remove excess wild horses and burros to protect land health. Second, the BLM’s management actions must conform to decisions made in existing RMPs; these plans require the BLM to

maintain wild horse and burro population size within AML. Third, if the BLM stopped gathers, populations could exceed 61,000 animals in FY 2014, requiring the removal of at least 12,000 excess animals just to hold population size steady. Allowing populations to grow to this level would not only affect other multiple uses, but would also damage rangeland vegetation, threaten habitat for wildlife, including threatened, endangered and sensitive species, and ultimately threaten the quality and quantity of forage and water available for use by wild horses and burros. The removal of even larger numbers of excess animals would be needed in the future to achieve AML in the 10 Western states — and lead to placing even greater numbers of unadopted wild horses into long-term holding — and escalating costs for their care. As noted by GAO (2009) and OIG (2010), such funding increases are not sustainable.

The BLM’s Proposed Strategy

The BLM’s proposed comprehensive long-term plan and policy for future wild horse and burro management is presented below. Under this plan, the Wild Horse and Burro Program will be guided by the following goals, objectives, and management actions:

SUSTAINABLE HERDS

Goal: Manage wild horse and burro (WH&B) populations on public lands so that healthy rangelands and animals are maintained in a thriving natural ecological balance with other multiple uses.

Objective 1: Maintain the population of WH&B within the established AML for all of the HMAs.

Action 1: Beginning in FY 2012 through FY 2014, remove an estimated 7,600 excess animals per year to temporarily hold population size at approximately 32,000 to 36,000 animals on the range. Prioritize gathers in areas where overpopulation most threatens land health, animal welfare, and public health and safety.

Action 2: Consider adjustments to AML through in-depth analysis of herd and habitat monitoring data, and following appropriate NEPA analysis with public involvement.

Objective 2: Use a wide range of fertility control and other population control measures to slow herd growth rates and better align the number of excess WH&B which need to be removed with the number of animals that can be placed in private care.

Action 1: Implement “catch, treat, and release” (CTR) gathers with the principal goal of applying PZP fertility control to 2,000 mares per year to reduce the number of on the range pregnancies. Decisions on where and when these gathers would take place following appropriate NEPA analysis.

Action 2: Adjust herd sex ratios to favor males to reduce the number of on the range pregnancies following appropriate NEPA analysis.

Action 3: In herds where biologically sterile mules are a component, return mules to the range reduce the number of pregnancies and assist in slowing herd growth rates.

Action 4: Consider incorporating a non-reproducing component in a number of Herd Management Areas (HMAs), while maintaining the remainder of the herd as a self-sustaining (reproductive) population.

Objective 3: Implement actions to improve WH&B management within HMAs.

Action 1: Enter into voluntary agreements with livestock operators to trade use areas (livestock to WH&B) where feasible.

Action 2: Identify opportunities to mitigate impacts to WH&B, where appropriate, from authorized activities on the public lands.

Objective 4: Improve gather efficiency and expand the use of various gather techniques.

Action 1: Implement bait or water trapping gather techniques where feasible.

Action 2: Increase national in-house gather capabilities.

Action 3: Improve the number and type of local and national gather contracts, including consideration of stewardship contracts, assistance agreements, volunteer agreements, or other types of partnership agreements.

Objective 5: Conduct rangeland health assessments, herd health evaluations, and habitat monitoring (utilization, trend, actual use, and climate data) in order to verify appropriate management level (AML) ranges and determine progress toward attainment of land health as well as long-term sustainable herd health.

Action 1: Use best available rangeland health information to support decisions that affect the management of WH&B herds and their habitat.

Action 2: Coordinate WH&B habitat monitoring with other resource program's monitoring activities and continue habitat and herd monitoring.

Action 3: Monitor body condition and forage and water availability to evaluate herd health. When conditions require, take appropriate action to protect the health of wild horses and burros and the land they depend on for habitat.

Action 4: Use current science to estimate WH&B population size.

Action 5: Continue sampling to evaluate the genetic diversity of WH&B herds, and take appropriate action to mitigate any concerns.

ECOTOURISM

Goal: Provide opportunities for ecotourism and value-added opportunities for local economies while maintaining the health of all WH&B and the public lands.

Objective 1: Develop public recognition for WH&B herds.

Action 1: Promote WH&B herds through partnerships. Develop and maintain local support groups to focus their volunteering efforts on herd management areas.

Action 2: Explore ecotourism and marketing strategies for our HMAs through partnerships. Consider good examples of success in ecotourism and value-added opportunities to local economies.

PASTURES AND PARTNERSHIP SANCTUARIES

Goal: Provide for sustainable long-term care of excess, unadopted WH&B in the most cost-effective manner in long-term pastures or partnership sanctuaries.

Objective 1: Provide additional capacity for the humane care of excess, unadopted WH&B in long-term pastures and partnership sanctuaries in a manner that is equally or more cost-effective than at present.

Action 1: Maintain existing, long-term pasture capacity to care for excess, unadopted WH&B.

Action 2: Solicit and evaluate proposals for partnership sanctuaries and acquire additional long-term pastures for unadopted excess WH&B (non-reproducing).

Action 3: Explore opportunities to partner with the Farm Services Agency to provide humane care for excess, unadopted WH&B through their pasture programs.

Action 4: Seek authority to extend the period for contracts or assistance agreements from a maximum of 5 years to 10 years to provide greater stability/assurance of pasture availability, and continue to solicit (contract) for long-term grassland pastures for a minimum of 200 and a maximum of 5,000 wild horses.

Objective 2: Manage pastures and partnership sanctuaries in a manner that maintains excess, unadopted, and non-reproducing WH&B in pastures large enough to allow free-roaming behavior while providing the food, water, and shelter necessary to sustain them in good condition.

Action 1: Continue to follow existing animal care requirements in existing contracts.

Action 2: Seek partnerships with existing animal sanctuaries/preserves for the placement of wild horses.

Action 3: Open a dialogue with potential partners: land trust and open space organizations, conservation and sportsman groups, private forestry corporations, state or local open space areas, Native American tribes, and others.

Action 4: Explore transfer of animal title to the partner.

Objective 3: Provide opportunities for ecotourism and public viewing.

Action: Explore opportunities that include training, grants, tax incentives, emphasizing opportunities for tourism, and developing some privately owned, and economically self-sustaining partnership sanctuaries.

PLACE EXCESS ANIMALS IN PRIVATE CARE

Goal 1: Place more animals into private care.

Objective 1: Expand the adoption/sale demand.

Action 1: Incorporate recognition of the 40th Anniversary of the 1971 Wild and Free-Roaming Horses and Burros (1971 Act) into adoption promotion and marketing in FY 2011.

Action 2: Increase the use of Internet-based placement.

Action 3: Increase the use of incentives to help defray the cost of horse ownership.

Action 4: Send letters to Federal, state, or local agencies encouraging them to consider using wild horses in their field work.

Action 5: Improve national/state/field level coordination of adoptions. Ensure a uniform, consistent, and cohesive national/regional adoption effort (i.e., coordinate the scheduling of BLM-sponsored adoption events).

Action 6: Expand the marketing to specific equine disciplines and offer trained animals and sponsorships to their members.

Action 7: Explore new authorities for new incentives.

Action 8: Expand the use of wild horses in public service by working with Congress to permanently pass a law requiring government agencies to use trained wild horses before purchasing domestic horses.

Action 9: Explore a virtual adoption program to allow individuals unable to physically adopt or care for an animal to make a financial contribution (virtually adopt) an unadopted animal in a sanctuary or long-term holding pasture.

Objective 2: Offer more trained animals.

Action 1: Expand private partnerships to train animals without a Federal investment in infrastructure.

Action 2: Explore the Mustang Heritage Foundation's proposal to adopt 4,000 animals each year, and other similar proposals.

Action 3: Expand University and/or prison partnership programs without a Federal investment in infrastructure.

Action 4: Establish more store fronts (privatized adoption facilities that can offer untrained and/or trained wild horses for adoption for the BLM (such as fostering volunteers, Trainer Incentive Program trainers, and others).

Goal 2: Develop a separate environmental education component for the WH&B Program.

Objective 1: Implement an environmental education program to tell the story of America's WH&B.

Action 1: Increase interaction with youth groups (e.g., 4-H, FFA, Boys and Girls Clubs).

Action 2: Work to create programs for youth (e.g., explore option to integrate Sally Ride’s youth science program and the First Lady’s plan for urban children.)

Action 3: Develop curriculum to species biology, history, and ecological interactions and impacts within larger biological communities and landscapes.

Action 4: Increase education opportunities at BLM-managed facilities through interpretation.

Action 5: Work with volunteers, partners, stakeholders, and others to host “Kids and Mustangs Days” throughout the U.S. in partnership with National Wild Horse and Burro Adoption Awareness.

Objective 2: Ensure WH&B are titled only to those individuals who provide the animals with a good home.

Action 1: Continue to conduct random, post-adoption compliance inspections and to address/resolve any instances of noncompliance or inhumane treatment consistent with existing BLM policy.

Action 2: Continue to rigorously screen applications to ensure the prospective purchasers of WH&B are committed to providing the animals with a good home.

Action 3: Continue to implement sales of WH&B with limitations (purchasers must sign a bill of sale acknowledging their intent to provide the animals with a good home).

ANIMAL WELFARE

Goal: Use a progressive approach to implement a Comprehensive Animal Welfare Program (CAWP). Develop and implement a CAWP to ensure the well-being of WH&B at gathers and in facilities. The CAWP will bring together a progression of new components such as education for employees, volunteers, and contractors; an ongoing, internal animal welfare assessment program; and periodic external reviews of our animal care and handling. Conduct the CAWP with complete transparency.

Objective 1: Develop and implement a Comprehensive Animal Welfare Program (CAWP).

Action 1: Use the structured approach successfully implemented by other industries to create a program to assess, monitor, document, and address noncompliance to ensure the BLM’s humane treatment of animals.

Action 2: Develop a WH&B Care and Welfare assessment tool.

Action 3: Consider recommendations from the American Horse Protection Association on findings from the independent observers.

Action 4: Continue the partnership with Animal and Plant Health Inspection Service to have veterinarians at gathers and conduct yearly visits to long-term pastures. Periodically review this partnership.

Action 5: Explore partnerships with other veterinary and professional organizations, such as the American Association of Equine Practitioners, to conduct external reviews of the BLM’s animal care and handling practices.

Action 6: Develop a rotating schedule and conduct periodic internal and external assessments in all BLM States.

Action 7: Consider hiring a full-time Animal Welfare Coordinator.

Objective 2: Demonstrate to the public and Congress how the CAWP will benefit the animals under our care.

Action 1: Develop an animal welfare mission statement.

Action 2: Prepare and implement a plan that includes outreach tools and performance standards to describe and explain the CAWP.

Action 3: Incorporate reporting of the BLM’s internal welfare assessment on the Website and in Reports to

Congress.

Objective 3: Provide a continuing education program on animal care and handling for employees, volunteers, and contractors.

Action 1: Develop an internal learning and training module.

Action 2: Implement training for employees, volunteers, and contractors.

SCIENCE AND RESEARCH

Goal: Use current best science to manage WH&B and pursue increased knowledge of WH&B-related science.

Objective 1: Pursue research that will improve methods and techniques to reduce WH&B population growth rates.

Action 1: Continue existing research on fertility control.

Action 2: Conduct new research for ovariectomy in mares and explore new research for sterilization of both male and female WH&B.

Action 3: Given a reasonable expectation of safety, implement promising management techniques as soon as they are practically, economically, and legally feasible.

Objective 2: Review and evaluate current science applicable to WH&B management.

Action 1: Commission the NAS to review earlier reports and make recommendations on how the BLM should proceed in light of the latest scientific research.

Action 2: Review historic research recommendations of the National Wild Horse and Burro Advisory Board regarding and determine if these were implemented, are no longer relevant, or need to be pursued.

Action 3: Review and update the cooperative research strategy between the BLM and U.S. Geological Survey regarding WH&B research priorities.

PUBLIC OUTREACH

Goal: Utilize effective communications to build the public's confidence and trust for the BLM's management of the WH&B Program.

Objective 1: Improve the WH&B Program's Website.

Action 1: Organize the Website in a manner that makes information easily accessible.

Action 2: Keep the Website current and up to date.

Objective 2: Increase the availability of WH&B Program information.

Action 1: Keep the Wild Horse and Burro Program System (WHBPS) data current, and initiate programming changes to facilitate timely and accurate generation of standardized reports for gathers, adoptions, sales, and facilities.

Action 2: Post standardized reports on the Website.

Action 3: Update Website information on a regular basis, including updated videos and photographs of wild horses in long-term pastures.

Objective 3: Continue to make opportunities available for the public to view WH&B on the range, during gathers, and at short-term or long-term holding facilities.

Action 1: Continue to provide information on the website about public viewing opportunities and post up-to-date information about ongoing gathers.

Action 2: Host an annual or periodic media and public tour of wild horses in long-term pastures.

Next Steps

- Procure the services of the National Academy of Sciences to review the three earlier reports (1980, 1982, and 1991) and make recommendations on how the BLM should proceed based on the latest scientific research.
- At the conclusion of the NAS study, the BLM will decide whether there is a need for a comprehensive Environmental Impact Statement (EIS) to analyze the potential impacts of several long-term wild horse and burro management options, or if changes in Federal law are needed. If the decision is made to prepare an EIS, a range of alternatives for future wild horse and burro management would be considered — each representing very different choices and outcomes for America's wild horses and burros and a broad range of potential social, economic, and environmental impacts.

Projected Program Costs

The BLM's Proposed Wild Horse and Burro Program Strategy

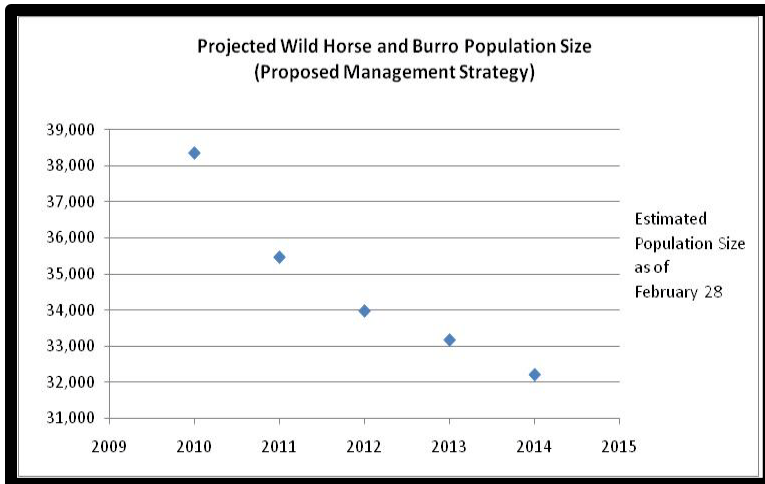
The Proposed Strategy assumes appropriations of about \$76 million over the next four years (equivalent to the President's FY 2011 funding request). The Proposed Strategy calls for a temporary reduction in planned removals of excess wild horses and burros from Western public rangelands, to allow the BLM to shift Wild Horse and Burro Program funding to immediate priorities such as stepping up fertility control, boosting adoptions, and hosting meetings and workshops in response to the public's request for more dialogue on various wild horse management issues. The accomplishment of the goals outlined in this strategy is dependent on the level of funding received during FY 2011 through FY 2014.

Other assumptions are:

- Reduce the number of on the range pregnancies by proposing CTR gathers with the principal goal of treating 2,000 mares per year with PZP fertility and adjusting herd sex ratios to favor males, where appropriate. The decision to implement CTR gathers or adjust herd sex ratios to favor males would be made pending appropriate NEPA analysis.
- Adoption demand would be boosted (from less than 3,000 animals at the present time to over 4,000 animals) by offering more trained animals for adoption through work with private partners — existing facility adoptions and prison, fostering, and other training programs would continue.
- To obtain a fair and reasonable value for the American taxpayer, the BLM would provide humane care for unadopted wild horses in cost-effective contracted long-term pastures, partnership sanctuaries, or Farm Service Agency pasture programs.

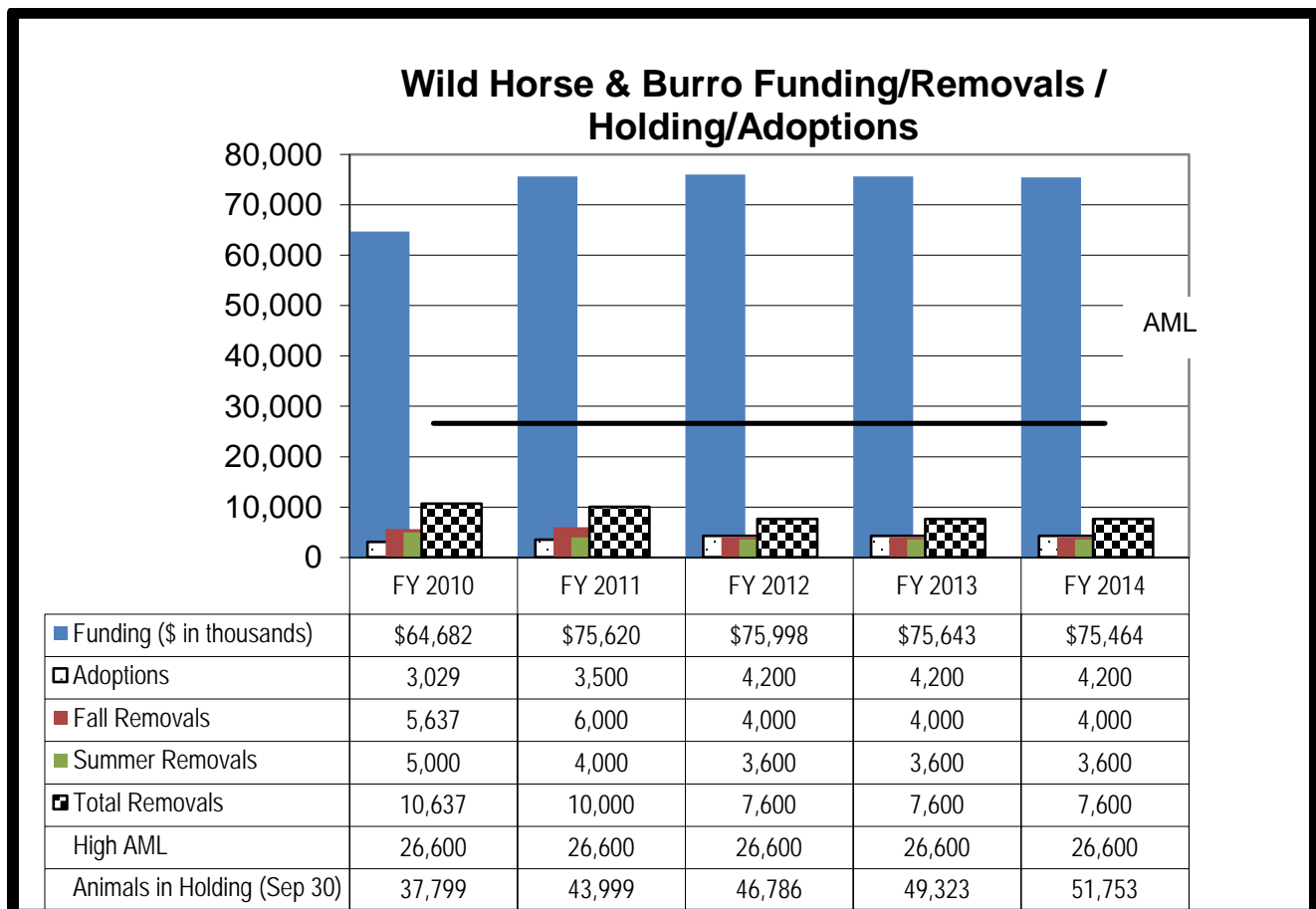
Projected program costs and the accomplishments expected with implementation of the BLM's Proposed Strategy are summarized in Figures 1 and 2.

Figure 1: Projected Wild Horse and Burro Population Size (Proposed Management Strategy)



Given adequate funding, the BLM would remove an estimated 7,600 excess animals per year, beginning in FY 2012 through about FY 2014. Wild horse and burro population size in the West would be maintained at approximately 32,000 to 36,000 animals during this timeframe.

Figure 2: Funding, Removals, Holding, and Adoptions under the Proposed Strategy¹



¹ The projected number of animals in holding at the end of FY 2011 assumes the removal of about 4,887 excess animals during the summer 2011 gather season. Beginning in 2012, the BLM hopes to enter into Partnership Sanctuary agreements that would place many of these horses into sanctuaries rather than in the traditional long term holding facilities.

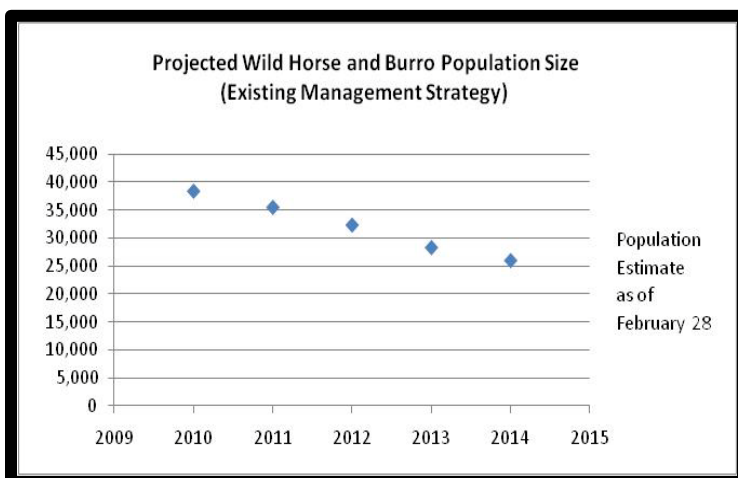
❖ Summary of Proposed Strategy

- Assuming appropriations of \$76 million per year during FY 2012 through FY 2014, wild horse and burro population size would be temporarily held at approximately 32,000 to 36,000 — approximately 5,400 to 9,400 animals more than the established AML of 26,600. About 62 percent of this funding would be needed to care for unadopted wild horses.
- Increasing adoptions to more than 4,000 wild horses and burros per year and decreasing the number of excess animals removed over the next three years to about 7,600 excess per year would better align the number of wild horses and burros removed from the range with the adoption demand in the short-term.
- The BLM would continue to maintain existing short-term corrals and long-term pasture contracts, or enter into cost-effective partnership sanctuaries or Farm Service Agency pasture programs, to acquire additional capacity as needed to humanely care for approximately 52,000 unadopted wild horses.
- Pending the results of the NAS review and additional information which may be gathered, the BLM will decide whether to prepare a comprehensive EIS to analyze the potential impacts associated with a range of wild horse and burro management options, or if changes in Federal law would be required, in order to place the Wild Horse and Burro Program on a sustainable track over the long-term.

The BLM's Current Management Approach

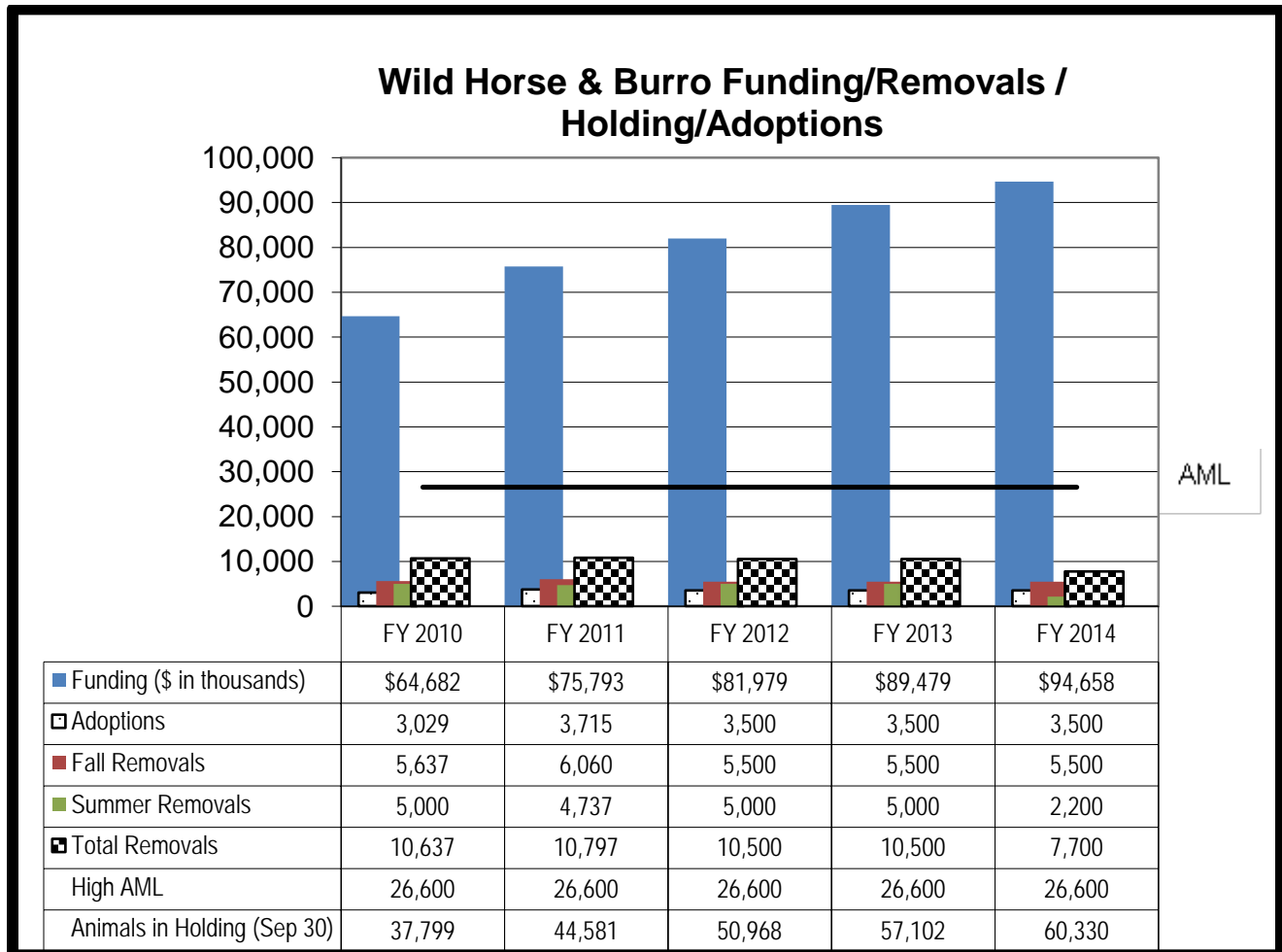
The BLM's Current Management Approach assumes increased appropriations from \$76 million in FY 2011 to \$95 million in FY 2014. Under this approach, the BLM could achieve AML (about 26,600 animals in the 10 Western states) in FY 2014. In order to achieve AML, the continued removal of thousands of excess wild horses and burros from the range during FY 2011 to FY 2014 would be required. Once AML is achieved, wild horse and burro population numbers would be in a thriving natural ecological balance with the land's productive capacity and other multiple-uses, as required in the WFRHBA. Removal numbers would also drop once AML is achieved (5,200 per year) — and could drop even lower with greater emphasis on the use of fertility control — and would better align with current adoption demand (3,000) over the long-term. Projected program costs and the accomplishments expected with the continuation of the BLM's current management approach are summarized in Figures 3 and 4. This information provides a comparison with the BLM's Proposed Strategy discussed above.

Figure 3: Projected Wild Horse and Burro Population Size (Current Management Approach)



The BLM could potentially achieve AML on a West-wide basis in February 2014 with the removal of approximately 10,500 excess animals per year in FY 2011 to FY 2013 and about 7,700 excess animals in FY 2014.

Once AML is achieved, only approximately 5,200 excess animals would need removal each year, allowing the BLM to better align removals with adoption demand.

Figure 4: Funding, Removals, Holding, and Adoptions under the Current Management Approach

❖ Summary of Current Management Approach

- Requires increases in appropriations from \$76 million in FY 2011 to \$95 million in FY 2014 — of this nearly 69 percent would be needed to care for over 60,000 unadopted wild horses in short-term corrals or contracted long-term pastures by 2014.
- AML could be achieved by February 2014 — but requires the removal of 10,500 excess animals per year in FY 2011-FY 2013 and about 7,700 animals in FY 2014.
- Once AML is achieved, removal numbers (5,200 per year) would better align with current adoption demand (3,500). CTR gathers for about 5,000 animals per year could potentially reduce removal numbers even further — potentially to as low as 3,500 animals per year.
- Over time, the number of unadopted animals in holding and costs for their care would be reduced. The potential risks to land and animal health would also be minimized as wild horse and burro population size is balanced with the land's productive capability and other multiple uses.

Comparison of the BLM's Proposed Strategy and the Current Management Approach

Item	Proposed Strategy				Current Management Approach			
	FY 11	FY 12	FY 13	FY 14	FY 11	FY 12	FY 13	FY 14
Funding Needs²	\$75.6	\$75.9	\$75.6	\$75.4	\$75.7	\$81.8	\$89.4	\$94.6
Total No. Removed	10,000	7,600 per year			10,000	10,500	10,500	7,700
Fertility Control (Treat No.)	2,000 per year				850	2,000	2,250	2,500
No. Adopted	3,715	4,200 per year			3,715	3,500 per year		
Total No. in Holding	43,999	46,786	49,323	51,753	44,581	50,968	57,102	60,330
No. On the Range (Projected)	35,472	33,979	33,175	32,210	35,472	32,279	28,235	25,882
AML (West-wide)	26,600							

Projected costs for the BLM's Proposed Strategy are lower than for the Current Management Approach through FY 2014. This is because the BLM has held the budget for the Proposed Strategy flat (at the 2011 proposed funding level), and assumes that no funds would be re-directed from other subactivities, such as wildlife, recreation and range management. No cost projections or estimates of gather/removal, fertility control or holding numbers are made beyond FY 2014 as these could be an outcome of an EIS effort or a change in Federal laws, if needed, to put the Wild Horse and Burro Program on a sustainable track over the long-term.

This approach provides the BLM with the time needed to consider recommendations from the NAS prior to deciding whether there is a need to prepare a comprehensive EIS. For example, the NAS could recommend other science-based approaches for future population management. If the recommended approaches are not in conformance with the BLM's existing RMPs, amendments to these plans and appropriate NEPA analysis (on a case by case basis or on a national level) would be required before the changes could be implemented. If the decision is made to prepare a comprehensive EIS, the BLM would analyze a range of future management options that could have very different long-term outcomes regarding the number of animals to be gathered, removed and placed in holding, and the associated costs; the approximately two-year planning effort could begin in about FY 2013.

The NAS could also potentially recommend management actions that would require changes to existing Federal laws. The NAS may also recommend future wild horse and burro management actions. If this happened, the BLM would need to pursue changes in Federal law before they could be implemented.

Under the BLM's Proposed Strategy, adoptions would be boosted from about 3,000 animals per year at the present time to over 4,000 animals per year. This would be accomplished by expanding partnerships to train wild horses, without a Federal investment in infrastructure. Existing training programs and partnerships would continue.

² Millions of dollars.

To reduce the number of on the range pregnancies, the BLM would also step up the use of fertility control, including proposing CTR gathers with the principal goal of treating 2,000 mares per year during FY 2012 through FY 2014 with PZP fertility control. The decision to implement CTR gathers would be made following appropriate NEPA analysis. This compares with fertility control treatment that averaged less than 500 mares per year in 2004 to 2010, and the proposed treatment of about 850 animals in 2011. The BLM would also adjust herd sex ratios to favor males where appropriate. Over the long-term, the BLM expects to implement fertility control more effectively as the number of HMAs with wild horse population sizes within AML increases.

In order to accomplish the immediate priorities of increased applications of fertility control, training wild horses to boost adoption demand, and conducting more research, the BLM would temporarily hold the numbers of wild horses and burros in the 10 Western states at about 32,000 to 36,000 animals — about 5,400 to 9,400 higher than the AML. This population level cannot be sustained over the long-term without amending the BLM's RMPs to "rebalance" the mix of multiple uses (e.g., reducing livestock grazing or wildlife numbers) in order to ensure land health objectives can continue to be met.

The BLM has assumed that some short-term and localized impacts to land health and wild horse and burro herd health could result from reduced removals of excess animals over the next three years. To minimize the potential for negative impacts, the BLM plans to work collaboratively with State and local governments, Native American tribes, and other interested individuals and groups to prioritize and schedule gathers in areas where land health, animal welfare and public health and safety are the greatest concerns. The BLM also plans to continue to monitor on-the-ground conditions and may take other appropriate actions, such as reducing or modifying other authorized uses of the public lands, if monitoring indicates such actions are necessary. The BLM will continue to prepare environmental assessments, with public participation, before on-the-ground activities, like gathers, are conducted.

Under the Current Management Approach, the BLM could achieve AML in the West by February 2014, but an increase in funding from \$76 million in FY 2011 to about \$95 million in FY 2014 would be needed. Of this, about 69 percent would be needed to care for over 60,000 unadopted wild horses in holding. The removal of 10,500 animals per year in FY's 2011 to 2013 and an estimated 7,700 animals in FY 2014 would be required. However, once AML is achieved, removal numbers (5,200) would better align with adoption demand (3,000) and the BLM would be able to expand the use of CTR gathers for about 5,000 animals per year beginning in FY 2014.

Appendix 1:

Detailed Summary of Public Comments on the BLM's Wild Horse and Burro Program Strategy Development Document (Released June 3, 2010) and the BLM's Response

SUSTAINABLE HERDS

Summary of Public Comments

Sustainable Herds: Many felt “Sustainable Herds” was the most important piece of the BLM’s strategy. While there was strong support for this strategic theme, there were sharply different views about which actions would be most appropriate for long-term wild horse and burro management.

These included:

- allowing wild horse and burro populations to “self-regulate”;
- making a serious commitment to control fertility;
- managing for a reduced Appropriate Management Level (AML) of 15,000 to 17,000 breeding animals;
- managing reproducing wild horses in a limited number of Herd Management Areas (HMAs) in each state under a concept of treasured herds in preserves or sanctuaries on the public lands;
- implementing sale without limitation or applying euthanasia to excess, unadopted horses;
- better aligning wild horse and burro removals with adoption demand by controlling population size using a number of population-suppression methods, including managing some HMAs for reproducing herds and others for non-reproducing animals.

Control Wild Horse and Burro Population Size: A number of commenters urged the BLM to control wild horse and burro population size and to manage the animals in balance with the land’s productive capacity and other resources and uses. Some supported the idea of balancing herd growth rates with the number of animals that can be placed in good homes (through adoption) each year while others felt excess animals must be removed regardless of adoption demand. Many recommended that the BLM use every tool available to get the numbers down and keep them down, including sale without limitation or the use of euthanasia. Some emphasized the need to make herd sizes fit the forage, not the other way around, especially in drought years.

Use of Fertility Control and Other Population Suppression Methods: There was strong support for the use of fertility control. While many supported sterilization as an alternative to gathers (i.e., castration or vasectomy of stallions or ovariectomy of mares), others favored a temporary form of fertility control. There was mixed support for sex ratio adjustments and non-reproducing herds. A key concern about the use of fertility control was whether or not this goal is realistic and attainable. Several individuals encouraged the BLM to make a serious commitment to an immunocontraception program and to use the one-year PZP via field darting. Others asked the BLM to explore new developments in population control including the use of SpayVac®, vasectomies, or the addition of fertility control agents to the animals’ feed.

Make More Forage Available for Use by Wild Horses and Burros: There was support for actions that would return wild horses and burros to their 1971 Herd Area (HA) acreage or that would expand wild horse and burro use to other areas of the public lands. Many expressed support for such management actions as voluntary relinquishment of livestock grazing permits or third-party purchase of livestock grazing permits. Some supported permanent closure of public lands to livestock grazing.

Others questioned whether such actions were truly implementable or in compliance with the 1934 Taylor Grazing Act.

There was also support for the opposing view that such actions would represent, at best, a short-term fix and would not solve the problem over the long term. These individuals felt that regardless of the target wild horse and burro population size, the population will eventually reach that size and the animals will no longer have adequate forage and water to maintain their health. Many felt this has potential to result in significant adverse impacts to land health, native wildlife species, and other resources on and uses of the public lands.

Still others felt wild horse and burro populations would “self-regulate” before such damage occurs and asked the BLM to let natural processes work to control wild horse and burro population size.

The BLM’s Response

Sustainable Herds: The divergent views expressed by the public underscore the challenge the BLM faces in managing wild horses and burros in the 10 Western states. The public has suggested various future management options — each of which represents very different choices and outcomes for America’s wild horses and burros. These suggestions could result in changes (either up or down) to current wild horse and burro AMLs, the number of herds managed, or the areas of public lands designated for their long-term use. There could also be changes in how population sizes are controlled and managed (such as increased use of fertility control, reliance on natural population controls, or management of some non-reproducing herds). Before many of these types of changes could be implemented, the BLM would be required to amend existing land use plans (Resource Management Plans, or RMPs) on a case-by-case basis or on a national-level, in accordance with the National Environmental Policy Act (NEPA) and applicable Federal regulations. Changes to existing Federal laws under which wild horses and burros are managed may also be needed (i.e., the Federal Land Policy and Management Act (FLPMA), the WFRHBA or the Taylor Grazing Act).

The BLM plans to move forward with a study of wild horse management issues by the National Academy of Sciences (NAS). Expected to be completed in early 2013, the NAS will review previous wild horse management studies and will make recommendations on how the BLM should proceed in light of the latest scientific research. At the conclusion of the NAS study, the BLM will decide whether there is a need for a comprehensive Environmental Impact Statement (EIS) that would analyze the potential impacts of several wild horse and burro management options — or if changes in Federal law are needed in order to place the Wild Horse and Burro Program on a more sustainable track over the long-term.

Control Wild Horse and Burro Population Size: Beginning in FY 2012 through about FY 2014, the BLM will reduce removals from about 10,000 annually to about 7,600 excess animals per year. On-the-range wild horse and burro populations would be temporarily held at about 32,000 to 36,000 animals. Gathers would be prioritized in areas where they are most needed to protect land health, animal welfare and public health and safety. The BLM will also step up fertility control, including implementing “catch, treat and release” (CTR) gathers with the principal goal of applying PZP fertility control to 2,000 mares per year, or adjusting herd sex ratios to favor males, to reduce the number of on the range pregnancies. The decision about where and when these gathers would take place would be made following appropriate NEPA analysis.

Use of Fertility Control and Other Population Suppression Methods:

- **PZP:** An effective, safe, and cost-effective fertility control agent is an essential tool in the

management of wild horses. The BLM developed a Fertility Control Field Trial Plan designed to evaluate the effectiveness of PZP use in slowing herd growth rates in wild horses. Field research for two components of the Plan is nearly complete: (1) Individual-Based Trials and (2) Population-Based Trials. The individual animal-based studies were designed to investigate the behavioral implications of PZP treatments on wild horses, population dynamics, efficacy of the vaccine, body condition and foal health. The primary focus for population-based studies was to determine effect on population growth rates. The BLM is continuing research on the development of a longer-lasting 3 to 4 year PZP vaccine.

- **SpayVac®:** The BLM is also currently working with the USGS to conduct a five-year research project on the use of SpayVac® as a potential longer-lasting fertility control agent for wild horse mares. SpayVac, which is also based on the PZP antigen, uses a novel liposome technology that may stimulate a stronger and longer lasting immune response and hopefully longer-lasting infertility. The USGS will evaluate the safety and effectiveness of SpayVac® in captive wild horses. It is easy to handle and administer, and in one previous study a single vaccination with SpayVac® maintained a high level of contraception for 4 years in captive Nevada estray horses.
- **Spaying (Mares):** The BLM is currently reviewing a research proposal to investigate the development of a safe, effective, and humane surgical method for spaying (sterilizing) mares (ovariectomy).
- **Vasectomies (Stallions):** The focus of the BLM's past fertility control research has been mainly for mares. Given the social structure of the herds, any mature male has the ability to breed mares. Existing research shows that at least 15 percent to 33 percent of foals are sired by non-harem stallions, making it unlikely that fertility control focused on males would be effective in slowing population growth³. Performing vasectomies on stallions is not a widely practiced procedure within veterinary medicine. Post-vasectomy, it is expected that stallions would retain their stallion-like behavior. By contrast, gelding stallions (castration) is a routine veterinary procedure in both domestic and wild horses. Geldings lose their stallion-like behavior after a few months, are less competitive than stallions, and have fewer impacts on herd social behavior as a result. However, because of the continuing public interest in vasectomies as a tool for slowing wild horse population growth, the BLM has asked the NAS to determine if there is credible scientific evidence to indicate vasectomies would be effective in controlling herd growth rates or if there are other methods that the BLM should consider for managing stallions that would tangibly suppress population growth.
- **IUDs:** Pilot studies using coil-type intrauterine devices (IUD) and glass balls or marbles as IUDs have failed to demonstrate a long-lasting effect on conception in mares. In both instances, mares "slipped" the devices and became pregnant soon thereafter. The application of IUDs is further complicated by the difficulties associated with identifying a time window for application when mares are not pregnant.
- **GonaCon™:** GonaCon™ is an experimental fertility control vaccine that is being developed for potential use as a management tool for deer. Tests of the GonaCon™ vaccine are ongoing in several states and countries involving a wide range of wildlife and feral species, including horses. Previous studies indicate it is effective in maintaining infertility in horses for about one year comparable to the one-year formulation of PZP. A National Park Service sponsored test of the GonaCon™ vaccine on wild horses is ongoing in Theodore Roosevelt National Park in North Dakota. The BLM is awaiting the results of this project and will evaluate the potential of

³ Asa, C.S. 1999. Male reproductive success in free-ranging feral horses. *Behavioral Ecology and Sociobiology* 47:89-93; Bowling, A.T., and R.W. Touchberry. 1990. Parentage of Great Basin feral horses. *Journal of Wildlife Management* 54(3):424-429; Kaseda, Y., and A.M. Khalil. 1996. Harem size and reproductive success of stallions in Misaki feral horses. *Applied Animal Behaviour Science* 47:163-173.

GonaCon™ as a contraceptive agent based on the results of this research.

Population Self-Regulation and Predation: The BLM has asked the NAS to review the Wild Horse and Burro Program and determine if there is credible scientific evidence that allowing populations to regulate themselves and/or allowing predators to control population size could be effective.

Make More Forage Available for Use by Wild Horses and Burros: Under the Proposed Strategy when cost-effective, the BLM will work with third-party purchasers or private partners who are willing to make their authorized livestock grazing use available for use by wild horses or burros. The BLM will also consider proposals to voluntarily trade livestock use areas for use by wild horses and burros.

TREASURED HERDS

Summary of Public Comments

Most felt that every wild horse or burro herd is treasured in someone's eyes. They suggested that the BLM drop this element of the strategy. Others felt there was marketing potential (adoptions/ecotourism opportunities) on which the BLM should capitalize. Still others felt that the Treasured Herd concept would create warm and fuzzy feelings that will make on-the-range management issues more difficult. One commenter noted that the "Treasured Herds" and "Preserves" elements provide hints at what could be if areas of land were managed primarily for horses, burros, and wildlife, with livestock excluded. The commenter added that with nearly 200 HMAs, a need to reduce horse numbers to AML on many of them, and a need to resolve conflicts between livestock and wildlife, the BLM is burdened with attempting to manage chaos. The commenter urged the BLM to focus on the management of treasured herds within selected preserves designated by Congress and to remove reproducing wild horses and burros from the remaining HMAs in the 10 Western states.

The BLM's Response

In response to public feedback, the BLM has dropped the concept of "Treasured Herds." However, the BLM will develop and maintain local support groups committed to focusing volunteer efforts on HMAs and will also explore ecotourism and marketing strategies for HMAs through partnerships.

PRESERVES

Summary of Public Comments

There was mixed support for the "Preserves" element of the strategy. Some felt there was little difference between the existing long-term pasture contracts and preserves. Others said preserves should be located only in the West and were opposed to having preserves in the Midwest. These individuals expressed concern about the animals' ability to adapt to the different feed and environmental conditions found in the Midwest since they are not native to that area. Others expressed concern about the animals being kept in holding pens for the balance of their lives. Many of those commenting supported partnership preserves such as Madeleine Pickens' Soldier Meadows or the Winecup Gamble proposals. There was limited support for Federal acquisition of private lands for preserves. Others felt that the BLM needed to deal with this issue by implementing sale without limitation or by euthanizing excess, unadopted animals rather than continuing to expend large sums of taxpayers' money for their care.

The BLM's Response

In response to this feedback, the BLM dropped the concept of Federally acquired "Preserves." This

theme was re-titled “Pastures and Partnership Sanctuaries” and the strategic goal has been revised as follows: *“Provide for sustainable long-term care of unadopted wild horses in the most cost-effective manner in long-term pastures or partnership sanctuaries.”* Under the proposed new strategy, the BLM would maintain existing long-term pasture capacity for unadopted and unsold animals and add capacity as needed, including the potential establishment of cost-effective public-private sanctuaries. The BLM will also explore opportunities to partner with the Farm Services Agency to provide humane care for unadopted animals through their pasture programs. Accordingly, the BLM’s request for \$42.5 million in additional funding in FY 2011 to acquire private lands for a Federally owned preserve is no longer being considered.

The BLM, it should be pointed out, does not confine wild horses or burros in holding pens for the rest of their lives. Rather, unadopted animals are provided humane care in contracted grassland pastures, primarily in the Midwest. The use of long-term pastures dates to a recommendation from the Wild Horse and Burro Advisory Board in the 1980s. The BLM presently has contracts with 20 ranches comprising 275,228 acres of grassland pasture for a combined capacity of just over 32,000 animals (an average of 8.6 acres per animal year-round). There, the animals live in an uncrowded and free-roaming setting on highly productive, privately owned grasslands.

Secretary of the Interior Salazar and BLM Director Abbey are not proposing to sell without limitation or euthanize excess, healthy and unadopted wild horses under the Proposed Strategy. A suggestion to euthanize or sell, “without limitation,” unadopted wild horses. While humane euthanasia and sale without limitation of healthy horses for which there is no adoption demand is authorized under the WFRHBA, Congress prohibited the use of appropriated funds for this purpose between 1988 and 2004 and again in 2010. This choice reflects the public’s values and passion for America’s wild horses and burros and this option is not under consideration.

PLACE EXCESS ANIMALS IN PRIVATE CARE

Summary of Public Comments

There was strong support for offering more trained wild horses for adoption and for partnerships. There was also support for environmental education, particularly for the development of programs that volunteers or partners could conduct or sponsor in collaboration with the BLM. A number of individuals expressed strong support for the BLM’s partnership with the Mustang Heritage Foundation. Others suggested that the BLM increase its advertising and marketing efforts and felt that, if we better understood our adoption market, our success would increase. Some said it was important for the BLM to return to the basics of a decade or more ago by providing post-adoption support (mentoring), managing expectations (what to expect when adopting an untrained wild horse), and providing tools for success (training clinics, videos, etc). Another commenter urged the BLM to consider “treasuring” all herds during the program's 40th anniversary (1971-2011).

The BLM’s Response

The BLM will incorporate recognition of the 40th Anniversary of the 1971 Act into adoption promotion and marketing in FY 2011 and will also work to promote wild horse and burro herds through partnerships. The BLM will also expand partnerships to offer more trained animals for adoption without a Federal investment in infrastructure. The BLM will explore the Mustang Heritage Foundation’s proposal to adopt out 4,000 wild horses in 365 days and other similar proposals and will continue facility adoptions and existing prison, fostering, and other training programs. The BLM will also work to create stand-alone wild horse and burro environmental education programs and activities. Additionally, the BLM will continue its ongoing efforts to ensure that wild horses and burros are titled

only to those individuals who provide the animals with good homes.

ANIMAL WELFARE

Summary of Public Comments

There was strong support for the establishment of a Comprehensive Animal Welfare Program (CAWP). Some commenters noted the need to recognize that humane treatment begins on the range and encouraged the BLM to remove excess wild horses and burros before forage and water become limiting. Others expressed support for a CAWP, but not at the expense of the need to control wild horse and burro populations. Still others said that the essential piece of a CAWP is to require random, external reviews of animal treatment and care.

The BLM's Response

The BLM will continue ongoing efforts to develop and implement a CAWP. Included will be periodic internal and external reviews of the BLM's animal care and handling practices. The results of internal and external reviews will be reported on the BLM's Website and to Congress.

The BLM will also develop and implement a continuous education program for animal care and handling for employees, volunteers, and contractors.

Elements of the CAWP currently underway include: work with the University of California at Davis to develop a Wild Horse and Burro Care and Welfare Assessment Tool; an independent observer pilot project with the American Horse Protection Association for gathers; and external review by the American Association of Equine Practitioners for gathers, short-term corrals, and long-term pastures.

In addition, the BLM has expanded its partnership with the Animal and Plant Health Inspection Service (APHIS). Through this partnership, APHIS provides credentialed professionals with doctorates in veterinary medicine to make recommendations to the BLM regarding animal care. These individuals possess extensive experience in humanely caring for and handling large animals, including equines.

SCIENCE AND RESEARCH

Summary of Public Comments

There was strong support for the use of current best science in managing wild horse and burro herds and for the BLM's proposed review of the Wild Horse and Burro Program by the NAS. Some commenters also asked the BLM to review earlier recommendations from the National Wild Horse and Burro Advisory Board to determine whether these proposals were implemented, are no longer relevant, or need to be pursued.

There was support for an increased investment in fertility-control research, although some felt that the BLM needed to work with third parties independent of Federal agencies. Others supported science and research but not at the expense of the BLM's legal obligation to manage wild horse and burro population sizes within AML to achieve a thriving natural ecological balance on the land.

A number of commenters expressed concern about the need to preserve the genetic diversity of wild horse and burro herds and gave the BLM a failing grade on this issue. Many felt it was critical for the BLM to have accurate estimates of wild horse and burro population size. Some suggested that the BLM explore the use of satellites or unmanned predator drones or infrared technology. Others encouraged the BLM to implement the USGS's population estimation research recommendations.

Many expressed the importance of the need for continuous monitoring of animal and land health conditions.

The BLM's Response

The BLM will continue to seek recommendations from accredited, independent experts to manage wild horse and burro herds in the West. As part of this commitment, the BLM has asked the NAS to conduct an independent, technical evaluation of the science, methodology, and technical decision-making approaches of the Wild Horse and Burro Program. The BLM will also review earlier research recommendations from the Wild Horse and Burro Advisory Board to determine whether these proposals were implemented, are no longer relevant, or need to be pursued.

The BLM is currently conducting research in partnership with a number of third parties including the USGS, the Humane Society of the United States, Texas A&M University, and others.

The BLM continues to work closely with Dr. Gus Cothran at Texas A&M to establish the baseline genetic diversity for each herd and to periodically collect genetic material (hair or blood samples) to detect any change from the baseline. When monitoring indicates that genetic diversity is a concern, Dr. Cothran makes recommendations to improve the herd's genetic diversity. Most of the herds sampled to date are genetically diverse with minimal risk for inbreeding.

Research conducted in partnership with the USGS and Colorado State University has identified two principal techniques to estimate wild horse and burro population size: mark-resight using photographs and simultaneous double-count with sightability bias correction. These methods produced the best results in a variety of conditions and account for the wild horses and burros that are not seen during the aerial survey. Because of the importance of obtaining accurate population estimates, the NAS has been asked to determine if there are better techniques that the BLM should consider (e.g., the use of genetics data, remote sensing, or unmanned aircraft).

The BLM continues to monitor animal and land health conditions (see 4700-1 Wild Horses and Burros Management Handbook at www.blm.gov for additional information). Because monitoring is so important, the BLM has incorporated a goal, objectives, and actions under the Sustainable Herds element of the strategy.

COMMUNICATIONS

Summary of Public Comments

Feedback regarding the "Communications" theme indicated that transparency was the single biggest issue. Many urged 100 percent transparency across the Wild Horse and Burro Program.

Others expressed concern about the Wild Horse and Burro Program's message. They suggested that any message has to tell a balanced story of the wild horse and burro program. Some noted that, while there were a reported two million horses historically (a figure that has never been authenticated), today, Western rangelands are unable to sustain relatively high levels of wild horses as a result of human population growth (urban expansion, highways, etc.) and other uses of our public lands.

Others asked the BLM to stop referring to starving wild horses and the agency's desire to save them, claiming that this is false information and asking, if range conditions are so limited, why aren't cattle, deer, and other wildlife starving too? Still others commented that the BLM needs to do a better job of

portraying the impacts associated with wild horse and burro overpopulation and urged the BLM to continue to reduce population size in order to achieve AML and a thriving natural ecological balance on the public lands.

Some commenters asked the BLM to hold more wild horse and burro workshops and to conduct site visits with stakeholders and other interested parties to develop a better strategic plan. Others said this approach would require the BLM and the Department of the Interior to listen to ecology experts, scientists, and animal-rights advocates, stating that the current trend of asking for input and “ignoring” the American public must end.

Others felt that the June 14, 2010, Denver workshop, the BLM’s Facebook page, and You Tube videos are good examples of positive changes. However, many stressed the need to reorganize the Website so that its information is updated more frequently and can be found more easily.

The BLM’s Response

In response to this feedback, the “Communications” element of the strategy was re-titled “Public Outreach.” The BLM will provide opportunities for the public and media to view wild horses and burros on the range, at gathers, and in short-term holding corrals and will host annual or periodic tours to view wild horses at contracted (privately-owned) long-term pastures. The BLM will continue efforts to re-organize the Website in a manner that makes information of interest more accessible and will provide factual, timely information through the Website and social media such as Facebook.

Based on the different and often conflicting views expressed about the potential impacts of wild horse and burro overpopulation to land health, wildlife, and other resources and uses of the public lands, the NAS has been asked to identify how the BLM might better balance the widely divergent and conflicting perspectives about wild horse and burro management with the use of the best available science in order to protect land and animal health.

At the conclusion of the NAS review, the BLM will decide whether there is a need for a comprehensive EIS that would analyze the potential impacts of a range of long-term wild horse and burro management options, or if changes to Federal laws are needed in order to put the Wild Horse and Burro Program on a more sustainable track over the long-term.

OTHER

Summary of Public Comments

Many of those commenting were critical of the BLM’s documentation under the National Environmental Policy Act (NEPA) and expressed concern about a perceived lack of information necessary to support a determination of excess wild horses or burros or the impacts of proposed management actions on a herd’s genetic diversity.

Several individuals suggested that the BLM needs to hire specialists with expertise in wild horse behavior and encouraged the BLM to subsidize academic programs to develop expertise in wild equid behavior and management at major universities. Many commenters suggested that management of the Wild Horse and Burro Program be transferred to other Federal agencies, states, or wild horse advocates or non-profit groups. Several individuals expressed a lack of support for the BLM’s multiple-use management mission and expressed concern about the use of public lands for mining, oil and gas development, and livestock grazing — all at what they consider to be the expense of America’s wild horses and burros.

A large number of commenters urged the BLM to implement an immediate moratorium on gathers until the NAS has an opportunity to conduct an independent review and make recommendations for changes in Wild Horse and Burro Program management. Some said the use of helicopters to assist in the gather of wild horses and burros was inhumane and should be immediately suspended or restricted to times of the year when it is not too hot or too cold. Others felt that the BLM needed to stop managing wild horses and burros as feral animals and instead manage them as reintroduced native wildlife.

The BLM's Response

The BLM takes public comments about the quality of its NEPA documentation seriously and will continue to make every effort to ensure that these documents are prepared in a manner that is consistent with applicable law, regulation, policy, and case law. As discussed above, the BLM also continues to work closely with Dr. Gus Cothran at Texas A&M to establish the baseline genetic diversity for each herd and to periodically collect genetic material (hair or blood samples) to detect any change from the baseline. When monitoring indicates that genetic diversity is a concern, Dr. Cothran makes recommendations to improve the herd's genetic diversity. Most of the herds sampled to date are genetically diverse with minimal risk for inbreeding.

Management of wild horses and burros is a highly specialized discipline. The BLM's wild horse and burro specialists possess Bachelor of Science or Master's Degrees from accredited colleges and universities in a number of applicable academic disciplines that include wildlife ecology, rangeland management, and animal science.

The BLM establishes policy and issues guidance to field specialists to ensure wild horses and burros are managed in a consistent, safe, effective, and humane manner. Policy guidance includes the issuance of program regulations (43 Code of Federal Regulations 4700), BLM Manuals and Handbooks, and Instruction Memorandums or Information Bulletins (see www.blm.gov for additional information). The BLM also conducts formal training on such subjects as wild horse and burro herd management, adoption compliance, NEPA, and contracting officer's representative and project inspector training. Examples of continuous, on-the-job training includes fertility control application; population estimation; resource (land health) monitoring; animal health monitoring; and equine behavior, care, and handling.

In passing the 1971 WFRHBA, Congress assigned the authority for managing wild horses and burros in the 10 Western states to the Department of the Interior's Bureau of Land Management and the Department of Agriculture's U.S. Forest Service. However, the BLM understands that sustainable solutions to the challenges of the Wild Horse and Burro Program are possible only through partnerships. In the years ahead, the BLM will work with private partners, local community support groups, and volunteers to consider the establishment of cost-effective wild horse sanctuaries or partner with the Farm Service Agency to provide humane care for unadopted wild horses through their pasture programs.

The 1976 Federal Land Policy and Management Act directs the BLM to manage public lands on a multiple-use and sustained yield basis. This means that the BLM must manage the public lands for an array of multiple uses in balance with the land's productive capacity. That said the BLM understands that many commenters believe wild horses and burros have not been allocated their fair share of the available forage while others feel that wild horse and burro population size must be managed within the established AML. In response to these divergent perspectives, the BLM has asked the NAS to evaluate

the approach described in the 4700-1 Wild Horses and Burros Management Handbook for AML establishment or adjustment and to determine if there are other approaches that should be considered.

The BLM considered requests for an immediate gather moratorium until the NAS study is complete. This option is not feasible at this time for several reasons. First, the WFRHBA directs the BLM to gather and remove excess wild horses and burros to protect land health. Second, the BLM's management actions must conform to decisions made in existing RMPs; these plans require the BLM to maintain wild horse and burro population size within AML. Third, if the BLM stopped gathers, populations could exceed 61,000 animals in FY 2014, requiring the removal of at least 12,000 excess animals just to hold population size steady. Allowing populations to grow to this level would not only affect other multiple uses, but would also damage rangeland vegetation, threaten habitat for wildlife, including threatened, endangered and sensitive species, and ultimately threaten the quality and quantity of forage and water available for use by wild horses and burros. The removal of even larger numbers of excess animals would be needed in the future to achieve AML in the 10 Western states — and lead to placing even greater numbers of unadopted wild horses into long-term holding — and escalating costs for their care. As noted by GAO (2009) and OIG (2010), such funding increases are not sustainable.

The BLM will continue to use helicopters to assist in the removal of excess wild horses and burros when it is determined through gather planning that it is the safest, most effective, and most humane manner of doing so. The OIG (2010) found that gathers to remove excess wild horses and burros were necessary and humane. A recent review of gather statistics confirms that direct gather-related mortality averaged less than one-quarter of one percent (0.24%) in FY 2010, which is very low when handling wild animals. Additional mortality can occur as a result of the need to euthanize animals with pre-existing injuries or conditions, including poor body condition from inadequate forage or water, which underscores the need to remove excess animals before forage and water supplies become too limiting. As part of its continuing commitment to animal care and welfare, the BLM has also implemented several programs over the past year that incorporate independent observations by individuals that possess extensive professional credentials and experience in humanely caring for and handling large animals, including equines. A recent report from these credentialed, independent observers also confirms the humane and effective use of helicopters and the easy pace at which the animals are moved.

In its 1982 Final Report, the NAS addressed the question of niche with respect to wild horses and burros. The NAS found that the ecological niches to which Pleistocene equids related do not exist today, and no other animals in the contemporary North American fauna would have the same niche relationships as the modern-day equids, with or without the latter's presence. While some advocate managing wild horses and burros as restored native wildlife, the BLM must comply with existing Federal law. Under the 1971 Act, the BLM is required to protect, control, and manage wild free-roaming horses and burros on the areas of public land where they existed at the time of the 1971 Act.

Appendix 2:

Questions and Answers

What feedback did the BLM receive from the public in response to the Wild Horse and Burro Program Strategy Development Document released June 3, 2010?

(Note: The Strategy Development Document, released for a 90-day public comment period that began June 3, 2010, described draft goals, objectives, and possible management actions for future wild horse and burro management.)

The public suggested a broad range of options for future wild horse and burro management—contrasting alternatives that represent very different choices and outcomes for America’s wild horses and burros:

- Focusing management on a smaller number of Herd Management Areas (HMAs) in the West, managed as wild horse sanctuaries, where wild horses and burros and native wildlife would constitute the principal resources on public lands, consistent with land-health objectives.
- Reducing the Appropriate Management Level (AML) of wild horse and burro herd populations or implementing an aggressive population-suppression program using the widest possible array of management tools to balance herd population growth with public adoption demand. These efforts would take place while maintaining other resources and uses on Western public rangelands, such as wildlife, watersheds, wilderness, recreation, and livestock grazing.
- Expanding wild horse and burro use areas to other places on public lands while allowing natural processes to control population size.

The changes suggested by the public could result in changes (either up or down) to current wild horse and burro AMLs, the number of herds managed, or the areas of public lands designated for their long-term use. There could also be changes in how population sizes are controlled and managed (for example, through increased use of fertility control, reliance on natural population controls, or management of some non-reproducing herds). Before many of these types of changes could be implemented, the BLM would be required to amend existing land-use plans on a case-by-case basis or on a national-level, in accordance with the National Environmental Policy Act (NEPA) and applicable Federal regulations. Changes to existing Federal laws under which wild horses and burros are managed may also be needed (i.e., the Federal Land Policy and Management Act of 1976, the Wild Free-Roaming Horses and Burros Act of 1971, and the Taylor Grazing Act of 1934).

What is the BLM’s response to the comments received?

The BLM has proposed a new strategy for managing wild horses and burros that is based on the public feedback received. Under the proposed new strategy, the BLM would place greater emphasis on the use of fertility control, including “catch, treat and release” (CTR) gathers, boost adoptions, establish a comprehensive animal welfare program, and call on the National Academy of Sciences (NAS) to review previous wild horse management studies and make recommendations on how the BLM should proceed in light of the latest scientific research. The NAS review is expected to be completed in early 2013.

As the NAS study is carried out, the BLM plans to remove approximately 7,600 excess animals annually from Western public rangelands—down from planned removals of more than 10,000 a year—to keep the overall on-the-range wild horse and burro population between about 32,000 to 36,000 animals during this timeframe. This temporary reduction in gathers will enable the BLM to address other elements of

the strategy, such as increasing applications of fertility control, training more wild horses to boost adoptions, and conducting more research.

At the conclusion of this the NAS study, the BLM will decide whether there is a need for a comprehensive Environmental Impact Statement (EIS) that would analyze the potential impacts of several wild horse and burro management options — or if changes in Federal law are needed in order to place the Wild Horse and Burro Program on a more sustainable track over the long-term. For example, the NAS could recommend other science-based approaches for future population management. If the recommended approaches are not in conformance with the BLM’s existing RMPs, amendments to these plans and appropriate NEPA analysis would be required before the changes could be implemented.

Why does the BLM believe that a comprehensive EIS or changes to Federal law could be needed?

The BLM’s management actions must conform to Federal laws and regulations as well as the decisions found in existing land-use plans (Resource Management Plans or RMPs). For example, the NAS could recommend other science-based approaches for future population management. If the recommended approaches do not conform to the BLM’s existing RMPs, amendments to these plans and related NEPA analysis would be required before the changes could be implemented. If the BLM decides to prepare an EIS, contrasting alternatives for future wild horse and burro management could be considered — each representing very different choices and outcomes for America’s wild horses and burros and each generating significantly different social, economic, and environmental impacts.

How does the BLM’s Proposed Strategy address the public comments that were received?

The BLM’s Proposed Strategy addresses many of the public comments that were received. For example, the public:

- showed strong support for an independent, technical review of the Wild Horse and Burro Program by the National Academy of Sciences. The BLM is commissioning such a study.
- voiced generally no support for the BLM’s proposal to designate “Treasured Herds.” This proposal has been dropped from the Proposed Strategy.
- showed virtually no support for acquisition of federally owned, long-term wild horse preserves. This proposal has been dropped from the Proposed Strategy; instead, the BLM will solicit proposals for wild horse partnership sanctuaries, which public comments generally supported.
- expressed strong support for measures that the Proposed Strategy has incorporated: expanding partnerships to make more trained animals available for adoption; developing and implementing a Comprehensive Animal Welfare Program; putting a greater focus on science and research; and increasing management transparency.

Won’t temporarily holding wild horse and burro populations at levels above AML result in damage to rangeland health and adversely affect wildlife and their habitat, as well as authorized uses of the public lands?

Under the Proposed Strategy, the BLM would temporarily hold the numbers of wild horses and burros in the 10 Western states at 32,000 to 36,000 animals — about 5,400 to 9,400 higher than the established AML of 26,600. This population level cannot be sustained over the long-term without amending the BLM’s RMPs to “re-balance” the mix of multiple uses (e.g., reducing livestock grazing or wildlife numbers) to ensure land health objectives can continue to be met.

The BLM has assumed that some short-term and localized impacts to land health could result from reduced removals of excess wild horses and burros over the next three years. To minimize the potential for negative impacts, the BLM plans to work collaboratively with State and local governments, Native American tribes, and other interested individuals and groups to prioritize and schedule gathers in areas where land health, animal welfare, and public health and safety are the greatest concerns. The BLM also plans to continue to monitor on-the-ground conditions and may take other appropriate actions, such as reducing or modifying other authorized uses of the public lands, if monitoring indicates such actions are necessary. The BLM will continue to prepare environmental assessments, with public participation, before on-the-ground activities, such as gathers, are conducted.

The BLM Website reports there are currently more than 38,000 wild horses and burros on the range, while the proposed strategy document says there are about 35,500. Also, the Website had said there were another 38,000 unadopted wild horses in holding and is now saying there are more than 40,000. Why the discrepancy?

The BLM reports wild horse and burro numbers at a given point in time. The current estimate of on-the-range wild horse and burro numbers (35,500) reflects projected population growth since February 2010, along with the number of animals removed during the summer of 2010, as well as the number projected for removal during the winter of 2010-2011, but does not include the results of aerial inventories that were conducted during this timeframe. The BLM is analyzing current year data and an updated population estimate will be available in about May 2011. Similarly, the number of unadopted in holding has been updated to reflect the number of animals removed from the range during the 2010 gather season, minus the number of animals adopted or sold during the same period.

Why isn't the BLM considering the implementation of an immediate gather moratorium until the NAS review is complete?

This option is not feasible at this time for several reasons. First, the Wild Free-Roaming Horses and Burros Act (WFRHBA) directs the BLM to gather and remove excess wild horses and burros to protect land health. Second, the BLM's management actions must conform to decisions made in existing RMPs; these plans require the BLM to maintain wild horse and burro population size within AML. Third, if the BLM stopped gathers, populations could exceed 61,000 animals in FY 2014, requiring the removal of at least 12,000 excess animals just to hold the population size steady. Allowing populations to grow to this level would not only affect other land uses, but would also damage rangeland vegetation, harm habitat for wildlife (including threatened, endangered, and sensitive species), and ultimately threaten the quality and quantity of forage and water available for use by wild horses and burros. The removal of even larger numbers of excess animals would be needed in the future to achieve AML in the 10 Western states, requiring the placement of even greater numbers of unadopted wild horses into long-term holding, accompanied by escalating costs for their care. As noted by the Government Accountability Office (FY 2009) and the Interior Department's Office of Inspector General (2010), such funding increases are not sustainable.

Will the BLM suspend the use of helicopters to assist in the removal of excess wild horses and burros?

The BLM will continue to use helicopters to assist in the removal of excess wild horses and burros when it is determined through gather planning that it is the safest, most effective, and most humane manner of doing so. The Office of Inspector General (2010) found that gathers to remove excess wild horses and burros are necessary and humane. A recent review of gather statistics confirms that direct gather-related mortality averaged less than one-quarter of one percent (0.24%) in FY 2010, which is a very low rate in

the handling of wild animals. Additional mortality can occur as a result of the need to euthanize animals with pre-existing injuries or conditions, including poor body condition from inadequate forage or water, which underscores the need to remove excess animals before forage and water supplies become too limiting. As part of its continuing commitment to animal care and welfare, the BLM has also implemented several programs over the past year that incorporate independent observations by individuals with extensive professional credentials and experience in humanely caring for and handling large animals, including equines. A recent report from these credentialed, independent observers also confirms the humane and effective use of helicopters and the easy pace at which the animals are moved.

Why can't the BLM immediately implement a fertility control-only management option?

Under the Proposed Strategy, the BLM will conduct research into the use of different fertility-control agents or other population-suppression measures. The goal for this research will be to develop longer-lasting and more effective methods for controlling population size, without the need for frequent gathers to remove excess wild horses or burros.

To reduce the number of on the range pregnancies, the BLM will propose CTR gathers with the principal goal of applying PZP fertility control to 2,000 mares per year. The decision to implement CTR gathers would be made following appropriate NEPA analysis. Herd sex ratio adjustments to favor males may also be implemented where appropriate.

Why can't the BLM just return excess wild horses and burros to the 19 million acres of original Herd Areas, or expand wild horse and burro use to other areas of the public lands?

Decisions to return unadopted horses to Herd Areas (HAs) would require the BLM to amend existing land-use plans and complete appropriate NEPA analysis on a case-by-case basis or on a national level. Designating lands for wild horse and burro use that are outside the 1971 HA boundaries would require changes to the WFRHBA.

Why can't the BLM allow populations to "self-limit" or predators to control population size?

The BLM has asked the NAS to review the Wild Horse and Burro Program and determine whether there is credible scientific evidence that allowing populations to regulate themselves and/or predation will be effective in controlling wild horse and burro population size before land or animal health is compromised.

Will the BLM euthanize or sell without limitation unadopted wild horses?

No. While humane euthanasia and sale without limitation of healthy horses for which there is no adoption demand is authorized under the WFRHBA, Congress prohibited the use of appropriated funds for this purpose between 1988 and 2004 and again in 2010. This choice reflects the public's values and passion for America's wild horses and burros and this option is not under consideration.

Why hasn't the BLM approved partnership sanctuaries such as the one proposed by Madeleine Pickens in Elko County, Nevada? Wouldn't these sanctuaries be more cost-effective than BLM's current practices?

The BLM remains committed to improving Wild Horse and Burro Program management by working together with people and organizations that care about these iconic symbols of the West. To ensure that the American taxpayer receives fair value, prospective partners will be invited to submit formal

proposals in response to a BLM solicitation for the establishment of private-partner wild horse sanctuaries. Procedures outlining how members of the public can enter into such a partnership will be completed within 30 days. Each proposal will be evaluated to: (1) ensure conformity with existing land-use plans and applicable Federal and state law and regulations, (2) evaluate its cost-effectiveness, and (3) ensure it would provide the land, forage, water, equipment, experienced personnel, and other resources necessary to protect land and animal health. RMP amendments and appropriate NEPA analysis could also be required before private-partner wild horse sanctuaries are implemented.