

**UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
COLORADO STATE OFFICE
2850 YOUNGFIELD STREET
LAKEWOOD, COLORADO 80215-7093**

In Reply Refer To:
4730 (CO-932) P

December 7, 2017

EMS TRANSMISSION: 12/07/2017
Instruction Memorandum No. CO-2018-007
Expires: 09/30/2021

To: District Managers

From: State Director

Subject: Authorize Use of Firearms to Euthanize Wild Horses and Burros by Non-Law Enforcement Personnel

Purpose: This Instruction Memorandum (IM) establishes the Bureau of Land Management (BLM) Colorado's requirements for on-the-job transport, possession and firearms use by non-law enforcement personnel to euthanize wild horses and burros with firearms. This IM provides guidance for complying with BLM WO IM-2013-059 (Wild Horse and Burro Gathers: Comprehensive Animal Welfare Policy); the Department of the Interior Departmental Manual Part 446; BLM Manual 4730; and BLM Handbook 1112-1, Chapter 37; and 1112-2, Chapter 17; pertaining to the authorization, qualification, use and storage of Bureau-issued firearms to wild horse and burro personnel. This policy does not apply to law enforcement personnel.

Policy/Action: Non-law enforcement personnel with firearms qualifications may be authorized to transport, possess, or use a firearm while on official duty to euthanize wild horses and burros that meet criteria outlined in Attachment 1. Personnel must be authorized to perform this duty and will strictly follow the training, safety and operational requirements outlined in Attachment 2.

In accordance with Federal Regulations, 18 U.S. Code § 930, firearms are prohibited inside Federal facilities. Exceptions are made for law and non-law enforcement personnel with firearms qualifications.

Timeframe: This Instruction Memorandum (IM) is effective upon issuance.

Budget Impact: Costs associated with implementing this IM will include purchasing firearms, ammunition and all associated equipment meeting established safety and storage requirements for each field office that manages wild horses. Annual costs include purchasing ammunition for training and the cost of shooting range fees to recertify firearms qualifications.

Background: The BLM Colorado manages four Herd Management Areas, one Herd Area and one short-term holding facility. Occasionally, wild horses and burros are injured from natural or human-related encounters and need to be euthanized in a humane manner to reduce undue suffering. The BLM can use either lethal injection or firearms to humanely euthanize wild horses and burros. Lethal injection is not an option for horses on the range due to drug residues that may poison wildlife or enter the environment. Currently, BLM Colorado relies on law enforcement to euthanize wild horses with firearms. Many times, law enforcement officers are unavailable to euthanize an animal in a timely manner, causing undue suffering. Allowing non-law enforcement employees to carry firearms in the field will allow timely responses to humanely euthanize wild horses and burros to prevent undue suffering.

Directives Affected: This IM is in compliance with the Department of the Interior Departmental Manual, Part 446; BLM Manual 4730; and BLM Handbooks 1112-1 and 1112-2, pertaining to the authorization, use, storage, issuance and qualification with the Bureau issued firearms by wild horse and burro personnel.

Coordination: This policy has been prepared by the Branch of Natural Resources with coordination between BLM Colorado district and field office wild horse and burro specialists, the BLM Colorado Chief Law Enforcement Ranger and the BLM Colorado Safety Officer.

Contact: For additional information, contact the Kevin Cohenour, State Safety Officer (970) 240-5344, John Bierk, State Chief Law Enforcement Ranger (303) 239-3893, or Laria Lovec, Wild Horse and Burro Program Lead (303) 239-3717.

Signed by:
Gregory P. Shoop
Acting State Director

Authenticated by:
Brian Klein
Colorado State Records Administrator

2 Attachments:

- 1 – [Animal Evaluation and Response \(8 pp\)](#)
- 2 – [BLM Colorado Requirement Governing the Management and Use of Firearms by
Non-Law Enforcement Personnel \(3 pp\)](#)