

# Implementation Plan for Wild Horses and Burros

The goal of this document is to provide a guide to actions that will attain appropriate levels of Wild Horses and Burros on the Range to maintain rangeland health in a humane, cost efficient and timely manner.

The **Wild Free-Roaming Horses and Burros Act** was enacted by the U.S. Congress in 1971 to protect wild horses and burros on federal land by placing them under the jurisdiction of the Bureau of Land Management (BLM) and U.S. Forest Service (USFS). Broadly, the law declares wild horses and burros to be “living symbols of the historic and pioneer spirit of the West” and stipulates that the BLM and USFS have the responsibility and authority to manage and protect herds in their respective jurisdictions within horse management areas (HMAs) where wild horses and burros were found roaming in 1971.

## **Appropriate Management Level (AML)**

An appropriate management level (AML) is the number of animals BLM scientifically calculated at the implementation of the WH&B Act, that can sustainably thrive in balance with other public rangeland species, resources, and uses in a given area.

As of 1 March 2019, the BLM estimated that there were 88,951 free-roaming equids (wild horses and burros) on BLM-administered HMAs. This is more than 3 times the ecological balance. This figure does not include an estimated 14,000-18,000 new foals or reflect removals since that date. To achieve herd sizes to sustain ecological balance the BLM would now need to remove more than 60,000 animals from designated HMAs.

## **Current Crisis**

- Wild horse and burro populations increase by 15-20 percent per year. As a result, populations can double every 4 to 5 years.
- Horses on the range are competing with wildlife for water, forage, and cover. Because of this increased competition, horses and wildlife are starving and dying. The impacts are exacerbated during droughts.
- BLM currently uses gathers and fertility control to manage populations. However, these current actions are not reducing the growth rates of horse and burro populations, and our western rangelands continue to deteriorate.
- On-range horse populations are growing by more than 15,000 animals a year. While horses and burros in holding facilities can be adopted, the number of adoptions has decreased over the years to fewer than 3,000 annually. As a comparison, there were 6,000 adoptions annually in the early 2000s and 12,000 in the late 1980s.

## **Impact on Rangelands**

- Unmanaged herds impact public lands and watersheds. Excess wild horses and burros overgraze native grasses and trample and pack soils, which opens the door to cheatgrass, other invaders and wildfire.

- Cheatgrass, an invasive grass that by June turns to stiff brown stems with sticky seedheads, is unhealthy for horses, burros and all livestock and is a wildfire hazard.
- Rangelands deteriorate quickly under excessive numbers of horses. Excess horses are being kept on the range because of the high cost of holding them in short and long-term holding facilities.
- Unmanaged herds trample springs and riverbed areas, negatively affecting water quality and access for wildlife.

### **Impact on Taxpayers**

- American taxpayers now pay over \$50 million annually to care for and feed the 46,000 horses and burros in holding facilities; nearly two-thirds of the bureau's \$80 million program budget.
- According to the BLM, about \$48,000 is spent on each unadoptable horse that remains in a corral and holding facilities over its lifetime.
- With nearly 50,000 horses held off-range that's billions of federal dollars that could be going toward education, healthcare or other taxpayer needs.

### **Driving Toward Solutions**

- Through the 1971 Act, the BLM and USFS have the authority to protect and manage wild horses and burros on public lands. They also have the authority to manage populations by removing animals from the range when necessary.
- Rules and restrictions enacted by Congress have impacted the BLM's ability to act. Policies need to be made to allow them to fully follow the 1971 Act.
- Appropriately reducing herd sizes will allow BLM and USFS to restore the health and productivity of public rangelands, improve the health of the horses and wildlife, and ensure multiple uses of public lands as mandated by law.

### **A Safe, Humane and Effective Plan**

#### **Sufficient Off-Range Holding:**

Adequate holding facilities are key to successful implementation of this plan and should be the primary focus of effort by BLM until contracts are in place for at least 25,000 horses or burros to be removed annually until AML is achieved.

Due to Congressional riders that prohibit any horses and burros gathered from the range to be sold without restriction and given that adoptions are woefully inadequate to keep up with on range reproduction, contracting for long term holding is the prime function that must occur before all others actions can proceed. Therefore, it is critical that BLM focus on solving this critical constraint so all subsequent actions can occur

The BLM must focus on both short term holding that will act as temporary holding/sorting and treatment corrals and long-term holding where animals removed from the range is spend the majority of their time.

### Proactive Proposal:

- 1- Use small off range holding facilities to test new or more effective contraception techniques.
- 2- Could some off range facilities be used as training and adoption centers?

Working with Logistics experts from the Armed Services and experts in moving large #'s of animals could be useful in identifying where the best places would be to locate short term holding facilities that would accommodate the transfer of horses to long-term holding facilities.

Ensure ROI for people willing to build corrals, or house horses.

Work with existing feed lots to encourage appropriate fencing requirements.

Alternatives: Barry and Gary's plan  
501 C3's

### Quality Completed NEPA:

Quality NEPA is critical to minimal delays in the gather process. Great efforts have gone into creating NEPA that will withstand litigation from litigious activist groups. Using NEPA that has withstood litigation as a template for other gather and removal Environmental Assessments (EA) should increase the odds of withstanding litigation and moving forward with gathers and removals. The Washington Office could create a 'library' of top quality EA's that should be used as a template for all field offices. Yes, EA's must be site specific and detail individual impacts and challenges, however, there is no need to recreate an EA from scratch every time a gather is needed. Using a designated NEPA team to review and create such NEPA would also be a solution worth analyzing.

All EA's should analyze a combination of gather/removal and a full suite of contraception options. The implementation of contraception on the range should not wait until Appropriate Management Level (AML) has been achieved in a Herd Management Area (HMA). While the use of contraception may be most effective when AML has been achieved, immediate implementation of contraception on the range will decrease the reproduction rate of animals on the range.

EA's should cover a minimum of a ten year period and should analyze the potential need for multiple events for gather and removals or gather and treatment using any/all safe, humane, effective and approved contraception.

The Council on Environmental Quality is currently reviewing and updating the NEPA process. As these changes are completed in rule-making it would be advantageous to the BLM to make adjustments to the WH&B NEPA process. Examples would include tiering to a Programmatic EIS for all gathers with local Categorical Exclusions, or creating a specific Categorical Exclusion rule for WH&B when certain criteria are met, such as utilization measures or population targets.

Proactive Proposal: EA's or requisite NEPA should be kept up to date. New NEPA should be started 2 years prior to the expiration of the current NEPA so gathers, removals or application of contraception can occur without delay.

Use EA's until programmatic EIS is ready.

## **Comprehensive Gathers:**

To maintain a 'thriving natural ecological balance among wild horse populations, wildlife, livestock and vegetation and to protect the range from the deterioration associated with overpopulation" gathering Wild Horses and Burros must take place at the appropriate level, at the appropriate time in the appropriate location. The following discussion will focus on how to implement gathers in an efficient and effective manner.

When the BLM conducts gathers of WH&B's, they do an exceptional job in the mechanics of the gather operations. The gathers of WH&B are safe and effective for both the horses and the staff conducting the operations. However, improvements need to be made in the planning and scope of the gathers.

When conducting gathers for WH&B's the BLM should implement all available options for reducing herd overpopulation. The three main options would be removals, contraception and where needed sterilization. The management of the Wild Horse and Burro populations on public lands is an expensive and time consuming proposition that needs to use all available resources to maximize the effective use of taxpayer funds.

### **Gathers, Removals and Contraception**

**Helicopter, bait, water.**

**Return best genetics to the range for adoptable animals.**

**Use different contraception for different genetic classes.**

**How can we alleviate concerns from the Advocates about gathers.**

**Selection of HMA's using modeling and impact analysis.**

**Story telling about the gathers and plans.**

**(Prior HMA genetics study).**

#### **Contraception:**

**What is available**

**What needs to be available**

**Where current products are in study**

#### **Adoptions:**

#### **Range Impacts and Range Restoration:**

**Public Outreach and work with Advocates. (story telling)**

**Direct Reporting from WH&B Chief**

**Implementation dilemma:  
Get info from Dan.**

**Pick an HMA in each state that wants to participate to implement this plan for proof of concept. Use the success of these implementations to 'tell the story'. Different States/ different HMA's different solutions prove this can be accomplished west wide. Add a tribe for a test area, and Forest Service.**

**Public outreach: Using TikToc and other social media. Selling the story. Celeste Carlisle's video on issues associated with WH&B.**

**Restoration of Landscapes**