

WILD HORSE & BURRO MANAGEMENT



Unified Recommendations

By American Citizens and Experts

Based on:

- Science
- Sustainability
- Humane Handling
- Cost Effectiveness



Created at the Saving our Wild Horses and Wildlife
Conference April 2024

The following are the recommendations crafted by American stakeholders from diverse regions of the country, along with the expertise of professionals who collaborated to address the comprehensive management of wild horses, burros, and wildlife at the Saving Our Wild Horses and Wildlife Conference in Reno, Nevada, held from April 17th to 19th.

The list was created utilizing the best available information regarding regulations and policy. Each recommendation made by the coalition of wild horse and burro advocates is currently within the authority of the Secretary to act.

Recommendations for Ethical and Effective Wild Horse and Burro Management We respectfully submit the following:

1. Herd Management Area Plans (HMAPs)

Initiate HMAPs promptly, with at least two started per district by year-end, as mandated by **43 CFR 4710.5 with a deadline of 1-year for completion.**

Equity in the NEPA process must be facilitated. All current scoping practices that include disclosure of all relevant data, public meetings, etc. must be provided during the scoping for wild horse and burro HMAPs. In the vast majority of HMAs, advocates have waited

nearly 40 years for BLM to craft these plans and disclose basic facts including how Appropriate Management Level (AML) is set.

Enforce strict adherence to HMAP requirements to maintain ethical, humane, and legal standards in wild horse management practices.

2. On Range Management

Reevaluate Herd Areas (HAs) to identify potential repatriation.

We recommend accomplishing this goal through the HMAP process for HAs managed within complexes (for gathers) or as an independent evaluation. The regulations state no Land Use Plan revision is required for any change in AML.

Conduct thorough assessments to optimize HMA utilization and resource allocation effectively. Look into rewilding projects (studies) with universities for zeroed-out HMAs. (They are doing rewilding projects all around the world with horses and the United States is lagging far behind in utilizing wild horses as a

beneficial rangeland component.) **Implement CFR 4700.2** to prioritize the reduction and removal of cattle before horses, promoting sustainable grazing practices and for horse habitat preservation. Cattle are the number one cause of rangeland standards not being met across all BLM land. Per BLM data. They also cost us millions a year by not paying standard grazing fees. (This evaluation is appropriate in the HMAP process.)

Incorporate current scientific knowledge to ensure genetic diversity and viability that promote natural herd dynamics in wild horse and burro management practices. Currently most HMA do not meet this standard. AMLs do not reflect genetic health and adjustments are overdue. Interim AMLs set in the 1980s cannot simply be “affirmed” without any data based equation.

3. Mitigate Damage to Water Sources and Habitat Loss from Mining Disturbance

Implement measures to mitigate damage to resources (water, acreage loss) for wild horses and burros during mining exploration and operations and other industrial uses. Mitigation strategies should be addressed during site-specific NEPA (mining EIS and/or HMAP).

4. Wildlife Protection

End the killing of predators and wildlife sharing ranges with wild horses and burros. This is done at the request of a few special interests to great detriment.

Prioritize ecosystem balance and protect biodiversity within wild horse and burro habitats.

5. Wild Horse and Burro Management

Require wild horse specialists to receive specialized and ongoing training in wild horse ecology and behavior.

Prohibit the use of sterilization and other population growth suppression methods that substantially alter natural behaviors or impact health and well-being.

Prohibit vague descriptions of “fertility control” in population management plans and approval of conglomerate and indiscriminate application.

If fertility control is justified after all variables are disclosed through the HMAP, we recommend prioritizing reversible fertility control (PZP native).

Cease GonaCon usage until further research validates its efficacy and safety, adhering to established scientific protocols. BLM’s current method of use has never been studied. Feed-through studies are needed to establish the safety of use on other species in the ecosystem. The current protocol for application would likely last longer than the lifespan of the animals treated, jeopardizing herd health and genetic stability.

Cease all sex skewing strategies due to their adverse effects on herd dynamics and natural herd structures. Promote stable population dynamics by implementing measures that preserve the natural balance of wild horse populations.

Refrain from IUD implementation due to potential health risks and lack of conclusive evidence supporting their efficacy.

Sterilization of stallions should not be done. The procedure's complication rates are too high. (It also only takes one stallion to cover all mares.) On ranges where geldings were released (Sheldon), artificial use patterns were documented as geldings do not move, impacting herd distribution.

6. Allocation for CAWP

Allocate funding from the BLM Budget for Rulemaking for an enforceable welfare policy. The Comprehensive Animal Welfare Program (CAWP) is inadequate and provides scant monitoring. Every operation should have monitors present. Every facility must be reviewed annually.

Rulemaking is needed to align BLM's internal CAWP standard with industry best practices, facilitating enforceable and transparent humane handling.

7. Enforcement and Animal Welfare

Mandate background checks on all contractors involved in equine care, prohibiting those with a history of animal abuse from working with horses and burros. Implement stringent penalties for animal abuse, including the termination of contracts for non-compliance. These measures uphold ethical standards and deter mistreatment within wild horse management practices, prioritizing the welfare of these animals above all else. Safeguard animal welfare and mitigate adverse weather conditions by providing adequate shelter at holding facilities for all wild horses and burros. This would be done by the installation of shade and windbreaks at all holding facilities.

Cease the Adoption Incentive Program (AIP) and strictly enforce a permanent ban on individuals who abandon horses after being titled.

8. Recognition of Species

Recognize Burros as a separate species with unique needs.

Acknowledge burros as a separate species from wild horses and treat them accordingly. Ensure that management practices respect their unique behaviors and biological needs, promoting their welfare and conservation.

9. Gather Operations

No roundups should proceed until a Herd Management Area Plan (HMAP) is established for each Herd Management Area (HMA). This ensures legitimate and updated Appropriate Management Levels (AMLs) for each area.

Immediately halt the use of helicopters in the management of wild horses and burros. Develop more humane bait trap protocols for wild horse management to ensure the safety and well-being of these animals during capture and handling. They are being done by some private contractors.

Prioritize diversity in age groups when releasing horses back onto ranges to promote natural herd dynamics.

Minimize stress during captures and processing by following CAWP and having CAWP people at roundups, both public and BLM.

Immediately cease the euthanasia of horses with manageable conditions. Facilitate transfers to sanctuaries offering specialized care, ensuring that these animals receive the support and treatment they need to thrive.

10. Transparency and Oversight

Implementing these measures will significantly enhance transparency, accountability, and public trust in the BLM's management of wild horses and burros.

Establish a public portal on the BLM website to provide transparency measures for all aspects of the Wild Horse and Burro program.

Make data from gather operations accessible to the public in real time. Ensure that all shipping manifests, both incoming and outgoing, as well as reports on deaths (including those from preexisting conditions), injuries, and veterinary reports, are published on a BLM web portal, making data easy to find and accessible to the public. All holding facilities should allow public observation at least monthly.

Prioritize Public Oversight: Public observation during wild horse gathers must take precedence over conflicting interests. Implement measures to ensure impartial selection of viewing areas, prioritizing public meaningful access and transparency in gathering operations, including the round-up, sorting, loading, and all actions at temporary holding. Public access on private land should be guaranteed at all times.

Install cameras on helicopters and at bait trapping sites during operations. Real-time video footage should be accessible to the public, both during operations and afterward. This footage should be added to the roundup page for each gather. An independent third party should have control over this program.

Make BLM leadership, including district-level officials, easily accessible by providing direct contact information.

Involve all interested stakeholders representing wild horses and burros in decision making processes, ensuring balanced representation in all BLM actions. Reform the BLM Advisory Board to prevent control by special interests and include diverse perspectives. Address the FOIA backlog: Clear the backlog of Freedom of Information Act (FOIA) requests and make the requested information readily available to the public through the BLM website. Prioritize timely responses to FOIA requests to ensure transparency and accountability.

These comprehensive recommendations aim to address pertinent points, promoting ethical and effective management of wild horses and burros while enhancing transparency and

accountability within BLM operations. They are supported by leading experts and citizen stakeholders dedicated to preserving our public lands for generations to come.

By endorsing this initiative, these organizations and American taxpayers assert their strong support for these crucial measures to protect our wild horses, burros, and wildlife on public lands. We stand at a critical juncture in the fight against climate change, making these actions imperative for the survival of these species and the health of our ecosystems.