

DRAFT

Drought Monitoring

Partnership Project

WildHorseEducation.org

American Wild Horse Preservation Campaign



Winnemucca District, Bureau of Land Management (BLM) Wild Horse and Burro Program

Winnemucca Field Office

Areas Identified on 2013 Summer Removal Schedule

- **Background**
 - Highlighted Programmatic Challenges**
- **Identified Priority Ranges, Winnemucca**
 - Background**
 - Current Observations**
 - Recommendations**
- **Appendices**

Background, Highlighted Programmatic Challenges

The Bureau of Land Management (BLM) announced the roundup schedule for summer of 2013 on July 19, 2013. In the BLM announcement it was noted that removals were listed on the schedule based on drought emergency (drought is not an emergency condition in the BLM Handbook), public safety concerns (roadway incidents) and in response to complaints received by private land owners that animals are straying into residential areas and agriculture uses. BLM had listed 1300 animals on the removal schedule, in spite of constraints in holding facilities, in just the next eight weeks. Two of the areas have been removed from the schedule, Silver King and Delamar. The two areas identified on the BLM schedule for the Winnemucca District are the Snowstorm HMA (Owyhee Complex) and the Kamma HMA (Blue Wing Complex).

Agency	HMA/ Territory	Start Date	# Planned Gathered	# Planned Removed	Bait Trapping (B) or Helicopter Trapping (H)
FS/BLM	Carracas Mesa/Jicarilla (NM)	7/15/13	65	65	B
FS/BLM	Murderers Creek (OR)	7/20/13	100	100	B
BLM	Outside Beaty's Butte (OR)	8/15/13	40	40	B
BLM	Seaman/White River Has (NV)	TBD	50	50	H
BLM	Silver King (NV)	7/26/13	25	25	H
BLM	Delamar Mountains HA (NV)	7/28/13	30	30	H
BLM	Kamma Mtn (NV)	8/1/13	200	200	H
BLM	Maverick-Medicine HMA	8/1/12	60	60	B
FS/BLM	Hickison (NV)	8/1/13	30	30	B
BLM	Outside Big Sandy HMA (AZ)	8/1/13	60	60	B
BLM	Havasus-CA HMA (AZ)	8/1/13	45	45	B
BLM	Snowstorms (NV)	8/3/13	340	340	B
BLM	Fish Lake Valley (NV)	8/15/13	150	150	H
BLM	Gold Mountain (NV)	8/21/13	30	30	H
BLM	Sand Basin (ID)	9/1/13	25	25	B
BLM	Little Bookcliffs WHR (CO)	9/1/13	80	50	B
	Total		1330	1300	

As a programmatic statement BLM has announced that no PZP will be utilized in summer operations. BLM plans to do a re-treatment on mares in the Little Book Cliffs in Colorado only. Darting and vaccines will now be done November through February when treatments are more effective.

Current management practices by the BLM, that have relied on removals as a primary management tool, have created a crisis within the agency. More wild horses and burros now exist in BLM holding facilities than in the wild. More than 50,000 animals are now kept in captivity. The BLM now estimates that approximately 40,600 horses and burros live on public lands managed by the agency -- this number is not based on direct counts, but rather BLM-created population-growth calculations. Several independent estimates suggest the number of horses and burros remaining on public land as less than half of BLM estimates.

On June 5, 2013 the National Academy of Science (NAS) released a report commissioned by the agency to conduct a scientific review and make recommendations for the program that has received public criticism for years. The NAS report criticized the program citing an overall lack of science based decisions. This lack of science utilized in the program dates back to its inception and the drawing of boundary lines that are not based on seasonal movement. The report went so far as to cite certain current practices as likely responsible for increasing population rates on the range instead of curtailing them. To date no programmatic changes have been made.

It should be noted that the Winnemucca District (WD) is currently creating a new land use plan (Resource Management Plan or RMP) for the 8,448,130 acres of federally owned lands that lie within the district's jurisdiction. The selected management alternatives will form a [planning document](#) titled the Winnemucca District Office Resource Management Plan ([RMP](#)). The RMP is being developed in order to update and replace the existing Sonoma-Gerlach and Paradise-Denio [Management Framework Plans](#) (1982) (amended 1999). The plan was crafted before the finalization of the NAS report and the timeline to create language to include the recommendations has expired. Land use plans generally create the framework for management decisions for two decades. (Appendix 1, public comment to RMP generated by AWHPC/ASPCA)

Not until June of 2013 did the Winnemucca District finalize a Drought Management Plan. Drought is a recurring issue in many arid states in the West. Beginning last year this district used drought as a justification for wild horse removals including a removal at Jackson Mountain where BLM felt the situation was so urgent that they ran foals in June during BLMs own declared foaling season (of note that removal did gain a TRO during foaling season to all but extreme emergency). The area of Jackson had been the subject of emergency removals in the past. The press release on the drought EA can be accessed at this link: http://www.blm.gov/nv/st/en/info/newsroom/2013/may/winnemucca_blm_releases.html



Identified Priority Ranges, Winnemucca



Snowstorm HMA (Owyhee Complex)

The Snowstorm Herd Management Area (HMA) lies within the Owyhee Complex. The current removal is part of a ten year plan to remove horses from the Complex and is being conducted under the October 2012 Final EA and Record of Decision to remove horses within the Owyhee Complex. The current removal is part of a ten year plan to remove animals from the Complex. The basis for removals over the ten year plan will be based on the data in the signed decision. The EA cites no formal data within the HMAs of the Complex yet asserts that the movement does occur and utilizes that movement to create "Appropriate Management Levels" (AML) just at, or below, minimal currently accepted genetic viability standards created by BLMs contracted geneticist. Yet that movement is not noted in any documented trend pattern to adjust estimated populations over the life of the ten year removal plan.

In winter 2012/2013 the BLM removed a total of 947 animals from adjoining HMAs to Snowstorm. We know through observation that after removals, in areas that do have statistical movement (even if evidence is anecdotal), it is likely that animals will move in from other areas to fill a void left in the area of the removal. We have also seen that during removal operations animals will move off home ranges (the time it takes for animals to return is an unknown). This is not a factor in determining the planned removal activity.

From BLM website on the 2012 removal operation (descriptions of HMAs)

Owyhee Complex Wild Horse Gather Area:

The Owyhee Complex Wild Horse Gather includes five Herd Management Areas (HMAs), Little Humboldt, Little Owyhee, Owyhee, Rock Creek and Snowstorm. The gather area is located within Elko and Humboldt Counties. The Owyhee, Rock Creek and Little Humboldt HMAs are administered by the Elko District (Tuscarora Field Office). The Little Owyhee and the Snowstorm HMAs are administered by the Winnemucca District, (Humboldt River Field Office).

Little Humboldt HMA:

The Little Humboldt HMA is located in northwestern Elko County, approximately 90 miles northwest of Elko, Nevada, and is the smallest HMA with 17, 151 acres (15,734 public/1,417 private). The AML is 48-80 wild horses.

Owyhee HMA:

The Owyhee HMA comprises the northeast portion of the Complex and is 17 miles wide, 37 miles long and encompasses 336,262 public-land acres and 2,025 acres of private land for a total of 338,287 acres. The AML is 139-231 wild horses.

Rock Creek HMA:

The Rock Creek HMA is located in the southeastern portion of the Owyhee Complex and is located just south of the Owyhee Desert. The Rock Creek HMA contains 98,169 acres of public land and 23,264 acres of private land with an AML of 150-250 wild horses.

Little Owyhee HMA:

The Little Owyhee HMA is the largest of the five HMAs and is located in the northwestern portion of the Owyhee Complex. The Little Owyhee HMA encompasses 454,416 acres of public land and 5,811 acres of private land with an AML of 194-298 wild horses.

Snowstorm HMA:

The Snowstorm HMA is located in the southwestern portion of the Owyhee Complex. The Snowstorm HMA contains 103,644 acres of public land and 13,465 acres of private land with an AML of 90-140 wild horses.

Please note in the chart (BLM website) that AML is determined on an HMA by HMA basis.

Population Size and Appropriate Management Level (AML):

The following table displays the current estimated population within these HMAs.

HMA	2012 Estimate ¹	Current Population ²	AML
Owyhee	180	186	139-231
Rock Creek	346	424	150-250
Little Humboldt	26	23	48-80
Little Owyhee	1,123	1,097	194-298
Snowstorm	577	537	90-140
Total	2,252	2,267	621-999

- ¹Population estimate originally included in the Preliminary EA based on May 2011 surveys
- ²Population based on September 2012 surveys

The current plan to remove wild horses from the Snowstorm portion of the Owyhee Complex is to bait and water trap 340 animals. The recently crafted bait trap plan allows for no observation opportunities for the press and public of trapping of animals. There are other serious flaws with the bait trap plan that are currently being addressed with the filing of complaints (amended) in federal district court by Laura Leigh of Wild Horse Education.

The 2012 removal operation was the basis of a lawsuit (*Leigh v BLM*) to address inhumane conduct and inappropriate basis for determination of excess "Appropriate Management Level" in the HMAs. The suit generated strong language from the court on expectations of handling of animals after conduct was documented to include excessive hotshot use, foals run literally to exhaustion and even animals run into barbed wire fencing. The case is headed for hearing on Preliminary Injunction.





Current Observations

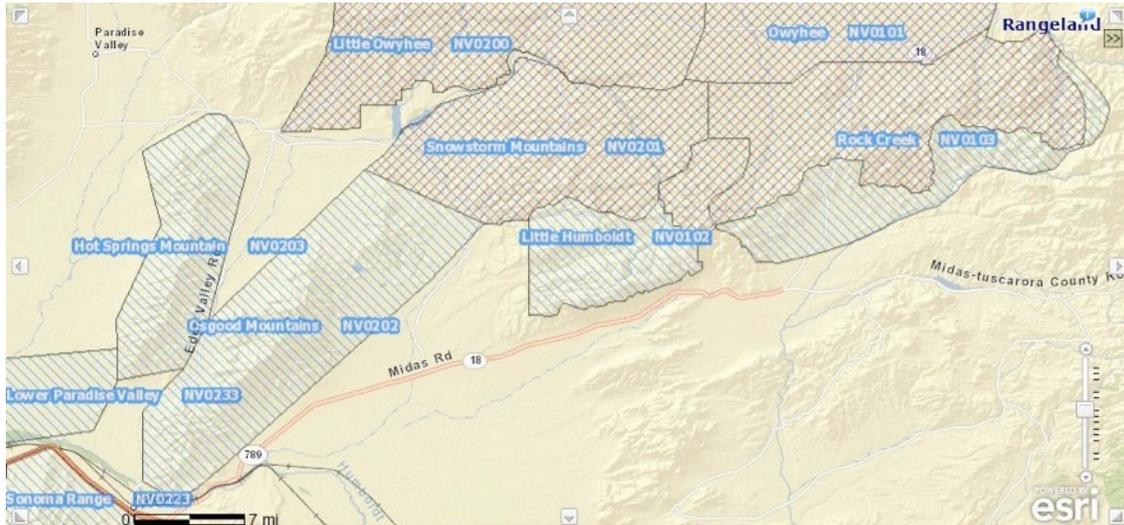
Current observations are based on a BLM tour given on June 25, 2013 of the area for the proposed removal.

Materials provided fail to provide any overview or assessment of the Snowstorm HMA. Materials and tour sites only address the southern edge of the HMA and what BLM contends are "off HMA" horses. Melanie Mirati, the wild horse and burro specialist, said that there was data indicating there was no historic use of the area by wild horses yet provided no data on the basis for the HMA boundary or any data to explain why horses would use a range that historically they never used before.

To further demonstrate the lack of complete information provided on the HMA itself documents provided on any range improvements only indicate improvements south of the HMA, in the HA area, and are significant in water source improvements for wildlife.

Logical conclusions based on available information and onsite observation indicate that this area, has had historic and current wild horse use. Observations of wild horse trailing, and history of use of the waters (mitigated for livestock use from the Goldfield mine) and the basic fact that the area south of Snowstorm was a Herd Area designated (yet changed) in 1971 indicate that horse use is historic in the area in contradiction of the statement made by the "specialist" during the tour. (see portion of NV HMA/HA)

Map of HMA and HA lines in Snowstorm (Owyhee Complex Area)



- Horses observed appeared in “good” body condition. Very few animals demonstrated a declining condition. 60-80 wild horses were observed. Heavily pregnant mares were observed in addition to newborn and young foals.
- Current water haul just outside the HMA, to a pipeline that was created for permitted livestock use as the existing spring was consumed by a mining operation, appeared to be a primary source of water for wild horses observed (less than half mile from BLM asserted boundary to the HMA, but well within the zeroed-out portion of the HA)
- A second pipeline (again a mitigation with the Goldfield mine) aprox. 2 miles south of the HMA border -- but again well within the zeroed-out portion of the HA -- appeared to be a relatively stable water source for wild horses.
- Large water tanks (6,000 gallon capacity) at the two other water hauls showed very little wild horse use (100/200 gallons use respectively). Acclimation to the large yellow plastic tubs was not evident. BLM stated that construction and hauling of water began aprox June 3rd.



Preliminary Recommendations¹

The information utilized in determining any appropriate action for actual management of wild horses in the Snowstorm HMA is absent from this decision. Until appropriate information and alternatives are proposed (and the reality of space in holding required for potential actual emergent situations is taken into account) the removal operation should be abandoned.

Instead of a reactive plan based on incomplete and erroneous information and long term solution for humane management:

- Redrawing of HMA boundary lines to include actual historic use of wild horses to include the noted primary water sources in the zeroed-out HA. Additionally, water sources within the HMA should be restored Alternatively water sources within the HMA should be restored, repaired or otherwise studied and incremental water hauling (with appropriate acclimation time to unfamiliar delivery systems be allowed) to draw animals back into the HMA.
- Until movement patterns and the effects of large scale removals are understood (like the one that just transpired 8 months ago) and those effects taken into account in decisions on management within the Complex, AML within the existing HMAs of the Complex can not be accurately determined on any given date in the future. Therefore excess is arbitrarily determined and possibly in violation of their intent of the parameters of the authorities of the Secretary of Interior.



¹ Information has been requested from the field office and district manager to finalize the information in this document and recommendations. Final document will be released after information is received and reviewed.



Kamma HMA (Blue Wing Complex)

The Kamma HMA is noted on the Bureau of Land Management (BLM) summer removal schedule. Historically removals in this area have been noted as “Blue Wing,” so previous large scale operations in this area will be found in a search of “Blue Wing.”

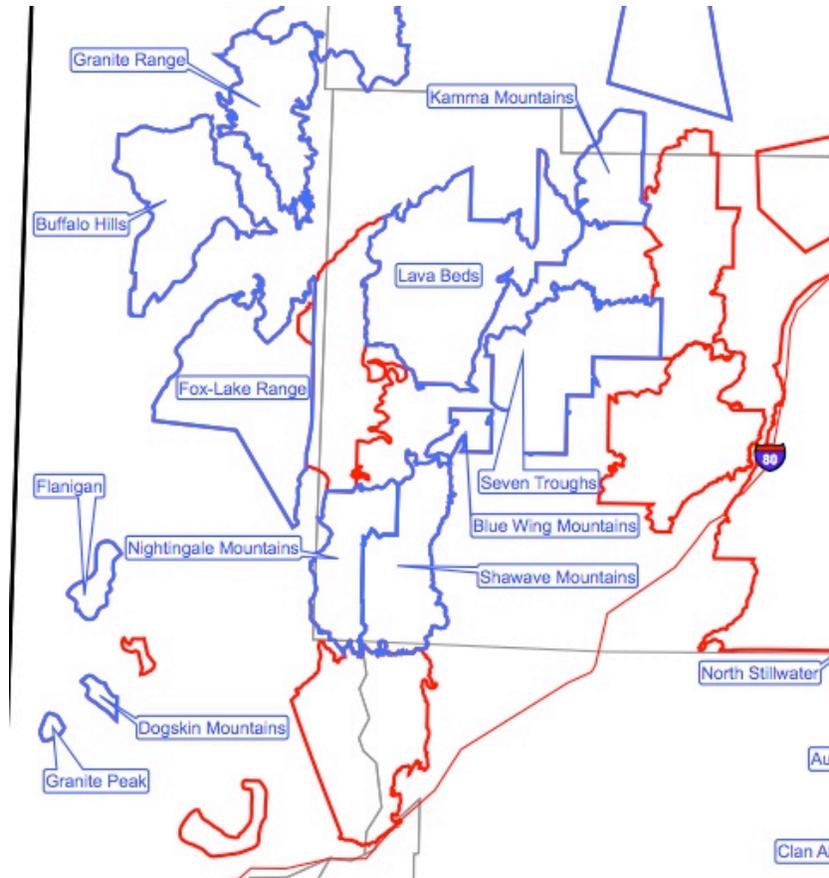
The Blue Wing Complex area is located generally between Lovelock and Gerlach, north of Imlay in a stretch of land that includes the Blue Wing Mountains, Kamma Mountains, Lava Beds, Nightingale Mountains, Seven Troughs Range, Shawave Mountains, Selenite Mountains, Antelope Range, and Trinity Range.

The last removal noted at the Blue Wing Complex is in a press release dated January of 2006. *During the gather, about 765 horses and 570 burros were captured. Of these, about 600 horses and 535 burros were removed from the public lands. This left over 330 horses and 90 burros in the Blue Wing Complex, which is in the lower range of the AML. Included among the released horses were 117 mares that were treated with a 2-year fertility control vaccine.*

A notation in a 1987 article in the *Hendersen Home News* indicates that a removal was planned for up to 1400 wild horses and burros from the area, but does not differentiate between the two.

Currently BLM estimates populations in the Complex at 1600 wild horses and 600 burros.

Please note the map below to see Herd Areas (HA) designated in 1971 in red removed from current Herd Management Areas (HMA) designated in Blue.



If for the purposes of discussion on how to manage the Blue Wing Complex we accept the BLM census as at least minimally accurate, the Blue Wing Complex clearly demonstrates that the assertion that large scale removals create an increase in population growth may be clearly demonstrated in fact in this instance.

A removal operation of 200 horses is planned for the area. No other actions are currently planned for the area.



Current Observations

Current observations are based on a tour of the proposed removal area given by the BLM on July 26, 2013.

- Wild Horses observed 60-70, but only 14 animals close enough to assess body condition. Horses observed demonstrated a body score of 3 to 4.5.
- Vegetation showed an overall use pattern that demonstrated stress to the range from grazing and drought. Significant growth of halogeton (noxious weed) and greasewood in the lowlands. Higher elevations showed little key grass production this year with minimal seed heads.
- Water sources showed significant impact from low flow and animal use. (Drought, wildlife, wild horses)
- Significant trailing (and evidence of current use of trails) throughout the area of the tour.
- Permittee of the Blue Wing/Seven Troughs allotment (over million acre allotment) states rotational year (one year on, one year off) grazing use by domestic cattle north to south within the allotment. It should be noted that the Kamma HMA is > 5% of the allotment). 2012/2013 had grazing within the HMAs with next year as a rest year for the HMA portions of the allotment. Cows grazed the HMA during the last 2021/2013 winter/spring season. Cows were removed in April 2013; the actual grazing numbers and duration are currently not known but this information has been requested and will be included in the final report. Permittee uses no fencing in the allotment and controls



water sources to encourage movement of livestock as needed. Water sources are turned back on for wild horse and wildlife use after cattle are moved from areas.



Preliminary Recommendations ²

Historic patterns of large scale removals have been ineffective methods of population control in the Blue Wing Complex. The NAS report noted that these types of removal operations are likely to increase population growth rates. In light of observations the following recommendations are made:

- The removal of 200 horses from the estimated population must be done in a transparent and humane fashion. Animals on the range experiencing current conditions should be removed with care, compromised animals should never be run any significant distance. Recommendations for a humane care standard have been repeatedly submitted (including during extensive litigation from Wild Horse Education). A joint roundup SOP recommendation (AWHPC/WHE) will be included as Appendix 2.
- Bait/water trapping should be conducted prior to utilizing helicopters to remove horses. Heavily pregnant mares and foals were observed in the area. Given that these animals may be in a partially compromised or compromised condition passive collection via bait/water trapping is a preferred and more humane methodology for any removals.
- A trap, treat and release operation would be recommended for this Complex. Care must be taken not to repeat the large scale “cut and burn” removals of the past.
- Cooperatives for tracking movement within the HMA could be facilitated by freezemarking released animals and agreements with advocacy groups.

² Information has been requested from the field office and district manager to finalize the information in this document and recommendations. Final document will be released after information is received and reviewed.

- Areas that were HMA that act as corridors between the HMAs be redesignated as HMA land, with the possibility of creating a Blue Wing HMA to facilitate cohesive management objectives.
- Complete the BLM website to include descriptions of this, 14 and all areas in the district. Winnemucca has the least available data on wild horses available to the public than any other states.

overall comment:

All efforts should be made to begin to change failed management practices on the range. Overcrowded facilities must be a factor in determining any removal operations and space must be preserved for actual emergency situations.

All efforts must be made to begin including “after action plans” in any document or decision BLM creates on proposed removals. Simply removing wild horses from the range is not management.

Appendix 1

Public comment to the Winnemucca District RMP generated by AWHPC/ASPCA

Please accept these comments on the draft Winnemucca Resource Management Plan (RMP).

The alternatives described in the Winnemucca RMP do not adequately protect and preserve wild horses and burros.

Under the scenarios presented, BLM would still rely on mass wild horse roundups and removals every four or so years to maintain population numbers. This fiscally irresponsible and cruel policy has resulted in the stockpiling of more wild horses (~40,000) in government holding facilities than are left free on the range (<33,000) and costs taxpayers tens of millions of dollars annually.

This RMP must set a policy that breaks the unsustainable cycle of roundups and removals in favor of managing horses on the range in a humane and cost-effective manner. This policy must include:

- Reducing or eliminating livestock grazing within designated wild horse and burro areas;
- Minimizing or eliminating harmful activities within wild horse and burro areas, including gas and oil exploration, mining and recreational vehicle activity.
- Fairly allocating forage and water resources for wild horses and burros within designated herd management areas.
- Increasing Appropriate Management Levels for wild horses and burros.
- Enhancing range conditions, including restoration and improvement of water sources for wild horses and other wildlife species.
- Protecting predators in an effort to restore natural population control mechanisms.
- Utilizing PZP fertility control, where necessary, to control wild horse reproduction.
- Supporting public/private partnerships for the creation of wild horse preserves and to implement alternative, in-the-wild management strategies.

Roundups should only be conducted in verifiable emergency situations. If necessary, roundups must be conducted with respect for the social integrity of wild horse herds; family bands should be relocated intact.

The zeroing out of Herd Management Areas (removing all horses and permanently closing the land to wild horses) should be prohibited. In addition, already zeroed out Herd Areas should be re-evaluated for potential re-introduction of wild horses and burros.

Over the last four decades, BLM has removed 20 million acres of wild horse habitat. This trend must be reversed.

I urge you to incorporate these important principles into the Preferred Alternative designated in the RMP.

Thank you for your consideration.

Appendix 2, Draft SOP for wild horse and burro removals

Standard Operating Procedures for Wild Horse Treat-and-Release Gathers (DRAFT)

These Standard Operating Procedures (SOP) for Wild Horse Treat-and-Release Gathers are to be used in conjunction with the Standard Operating Procedures (SOP) for Wild Horse Gathers. The following procedures for conducting a treat-and-release program will maintain the integrity of wild horse family bands in order to minimize trauma and disruption and facilitate successful release of treated bands back to the range. These SOPs for treat and release protocols shall apply whether a contractor or BLM personnel conduct a gather. For the purposes of this document, family bands and social groups refer to bachelor bands as well as stallion-led harem bands.

A. Pre-capture Evaluation of Existing Conditions

1. In advance of the gather, ongoing field observation shall be conducted and documented for identification of bands, individuals within bands and locations of bands to be gathered. Individual health or lameness issues should be noted.
2. In addition to the requirements set forth in the SOP for Wild Horse Gathers, the pre-capture evaluation shall include an assessment of the location, number of bands and individuals in each band to be gathered, as well as color markers that distinguish individual bands. A photographic record shall be made for this pre-gather assessment. This will facilitate planning of the capture operation and configuration of trap and holding pens.
3. Prior to the gather, motion-sensor cameras shall be installed at strategic locations, i.e. watering holes, to facilitate identification of individual bands.

B. Capture Methods used in the Performance of Gather Contract Operations

1. In order to keep horses in a band together, the rate of movement of the animals should not exceed the natural rate of movement of the slowest animal in the band. Every effort shall be made to keep older, sick and young animals together with their bands as they are moved into the trap.
2. If a member of a band is separated during the gather, an assessment will be made as to whether that animal should be gathered. In the event the animal is gathered, every effort will be made to place and hold that animal with its original band members after the animal is brought into the trap.
3. Solitary animals shall not be gathered.
4. Every effort shall be made to bring individual bands into the trap separately. If this is not possible, the number of bands brought into the trap per run shall be kept at a minimum to ensure the integrity of the social groups.
5. The number of bands captured per day shall be planned according to the pre-capture evaluation and shall not exceed the capacity of the holding pens to maintain horses within their family bands.

C. Construction of Traps and Holding Facilities

1. The temporary holding pens shall be constructed at the trap site. Both trap pens and holding pens shall be constructed to accommodate the maintenance of intact family groups and shall be configured based on the number and size of bands identified during the pre-capture evaluation. Pens shall be made as large as possible to reduce stress and tension among the animals.
2. A number of holding pens should be constructed away from other pens and can be separated by alleyways in order to provide adequate space to reduce tensions between bachelor and harem bands.
3. Pens with shared paneling shall have snow-fencing or a similar visual barrier on the shared paneling to minimize stallion interaction.
4. Bands, including bachelor bands, shall be housed individually. No mixing of social groups shall occur.
5. The on-site holding pens shall be equipped with stationery or mobile chutes and other necessary equipment to allow for processing and application of fertility drugs at the trap location.
6. In the event that holding pens are constructed at a separate location from the trap site, family bands members shall be identified and documented and will be kept together at all times during the holding period.

D. Holding and Release of Wild Horses

1. Horses shall be held in intact family bands, including bachelor bands.
2. Every effort shall be made to treat and release horses in the shortest time possible, after the horses have been given time to rest and recover from the gather, with the goal of treating and releasing horses within 24 hours of capture.
3. Bands shall be released at the same trap location where they were captured.
4. Bands shall be released individually, with sufficient time between band releases to allow the safe dispersal of horses back to the range.