

ALLIANCE OF
WILD HORSE
ADVOCATES
- - -
**REPORT AND
FORMAL COMMENTS
ON THE
SECRETARY'S
WILD HORSE AND
BURRO INITIATIVE**

- - -
Compiled by the Alliance
WHB Initiative Task Force
June 11, 2010



FOREWORD

In October, 2009, Secretary of Interior Ken Salazar proposed a national initiative that pertained to the management of wild free-roaming horses and burros. Advocates reviewed this initiative and while not in disagreement with some elements of this initiative, found some concepts to be troubling and/or not contributory to a desired outcome.

NEPA ePlanning Problems

Various members of the Alliance attempted to post comments using the NEPA ePlanning system. They found two fatal problems with this system.

1. Persons commenting who followed the directions on the BLM web site would actually erase the comment just submitted when entering their next comment. BLM was notified but as of this report had failed to correct the error in the instructions.
2. The Comments Wizard regularly stopped working at section 5.7.1 and returned a "Page Not Found" error, apparently losing all of the commenter's accumulated work.

The advocates determined that the ePlanning comments wizard is seriously unreliable and is ineffective for purposes of recording complete comments from a reasonable sample of those actually wishing to comment.

Hardcopy Comments

The Alliance convened a task force to prepare formal responses to the questions posed on the ePlanning web site and craft comments that reasonably reflected the positions of the participating groups. This submission follows the same order as the ePlanning document, and also includes an appendix.

A copy of this document will be submitted for the record during activities related to the National Wild Horse and Burro Advisory Board in Denver, CO. (June 14-15) and will also be posted on the Alliance of Wild Horse Advocates web site at www.aowha.org/documents/whb_initiative_comments.pdf where it can be viewed and downloaded.



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ALLIANCE OF WILD HORSE ADVOCATES
RESPONSES TO SECRETARY'S INITIATIVE,
BASED ON WHB STRATEGY DEVELOPMENT DOCUMENT

IMPLICATIONS

4.1.1. Use of fertility control

Fertility control can help regulate population growth with fewer adverse impacts on a given herd's genetic diversity. However to be successful BLM has to look beyond PZP and explore new 21st Century developments being advanced by entities such as The University of Nevada Reno and the UC Davis School of Veterinary Medicine. We are generally supportive of the concept of proactive fertility control provided methods and the science used are safe, practical and state of the art.

A volunteer noting the conditions of horses treated with GnRH fertility control



We would support moderate sex ratio adjustments provided they are within limits that do not produce undesirable or adverse sociological side effects.

4.1.2. Male only herds

We do not support the concept of male only herds in HMAs. Male only herds are contrary to the intent of the Wild Free-Roaming Horses and Burros Act. We support the concept for male only herds in CHAs

(Contract Herd Areas) or on new ranges opened up for the release of horses presently in long term contract holding.

Exceptions to this position would involve HMAs in which BLM has previously removed all horses, where BLM can demonstrate with validity that managing a breeding population is intrinsically unsafe and where the lack of population control would materially pose a significant and unreasonable threat to endangered species and/or sensitive critical habitat.

Contract Herd Areas (CHAs) as identified in this response would be public lands not previously identified as herd areas or herd management areas where non-breeding horse populations would be managed under contract.

4.1.3. Placement overseas

Advocates have attempted to facilitate appropriate overseas placement of horses in the past. For example, advocates worked with the US Department of State in an effort to get Canon City trained horses placed with the Trinidad and Tobago Mounted Police. The ASPCA gave the proposal a positive evaluation, but the advocates and Department of State were unable to obtain a waiver. There may be future appropriate exceptions for placing horses outside US borders, however any such activities must be undertaken through a recognized humane organization having jurisdiction within the country receiving the horses, and the organization must agree to ensure the proper care, treatment and welfare of horses received. We would support overseas placement under such well-regulated exceptions.

4.1.4. Increase private care

BLM needs to return to the formula used 10 years ago. BLM's largest adoption market is the average citizen who is motivated to take home a wild horse or burro. These people need to have realistic expectations and recognize the skill set necessary to be successful. Events such as makeovers and big shows are great for a specific market, however BLM must support basic adopter education. Such efforts will place more horses. A higher percentage of adoptions will be successful and people who have a good first time adoption experience often come back to adopt more animals.

Adopter Glenn Gable traveled from Chicago to Nevada to acquire 7 year old "Black Bart," showcased by advocates.



4.1.5. Revising adoption requirements

We would **not** support reducing adoption requirements. We have to help catch too many escaped horses as it is. With respect to shelters, there could be a policy adjustment allowing "alternative compliance" appropriate for local climactic conditions. For example, in a semi-tropical area a thick grove of trees could provide better and more natural shelter than a tin shed so long as it meets the intent of the standard.

We **strongly oppose** reducing the required proper maintenance and care period before title is issued.

While a vast majority of adopters provide good maintenance and care, a handful prove to be careless or neglectful. Adopter standards and accountability must be maintained.



5.1. SUSTAINABLE HERDS

5.1.1.1. Will this element lead to a successful strategy?

Clearly horse populations need to be maintained in relative balance with range resources. A more diverse approach of managing populations and managing and developing resources should, over time, improve range conditions and reduce program costs. Population based management should be balanced with resource based management.

Taken at face value this element appears sensible, however BLM has been tasked with such objectives for nearly 40 years with mixed and controversial results. We believe that this element will not lead to a successful strategy unless implemented through balanced and scientifically valid approaches that include elements of equine-based ecology in their application.

5.1.1.2. Suggestions

Realign HMA and HA boundaries where beneficial and appropriate so that herds have practical ranges in which to live. Utilize regional resource mapping to identify all relevant available resources. Provide water where needed so that horses and livestock can spread out their grazing pressure more favorably. (Water is a tricky issue but water resource development has been achieved and has produced successful results.) Focus more on principles of equine-based ecology to produce more self-sustaining ranges. If grazing permit buyouts are considered, concentrate horses in specific regions and concentrate commercial livestock in others. The state trapper workforce has been cut back due to budget cuts. Let the trappers focus on concentrated livestock areas and let predators help stabilize horse populations in "horse regions."

An advocate volunteer delivers water to allow horses to graze an area otherwise unavailable to them.



5.1.1.3. Will the groups assist?

Organizations in the alliance are already assisting a variety of horse and range related activities and are likely to continue supporting approaches viewed as rational.



5.2. HORSE PRESERVES

5.2.1.1. Will this element lead to a successful strategy?

We are adamantly opposed to preserves east of the Western states. Included in our reasoning for such opposition are:

- A. Obtaining Midwestern and Eastern preserves will be prohibitively expensive. Midwest and Eastern preserves will simply absorb more money needed to conduct accurate monitoring and resource development on public lands. These funds need to be spent to maintain our Western public lands.
- B. The Federal Government already owns millions of acres of public lands.
- C. Wild horses are "wild horses" by nature of their interaction with their environment. Horses held in pastures are simply pasture horses.
- D. While clearly there is more available forage in the Midwest and East as compared with some Western areas, there are management approaches that would allow "excess" horses to be kept in more natural and less costly environments in the West.

We support the concept if such preserves were to be in Western CHAs, such as described in the Winecup Gamble proposal.

We are certainly not opposed to BLM contracting to qualified operators for more proactive management of wild horses on western lands.

5.2.1.2. Suggestions

Discard the Midwestern and Eastern "horse zoo" idea and develop concepts such as Winecup Gamble. Please note that we do not present Winecup Gamble's proposal as offering the perfect answer, but it describes new low cost alternatives to indefinite contract holding and its model should be seriously evaluated.

5.2.1.3. Will the groups assist?

It is within our scope of activities of the allied groups to promote and assist any practical and cost-effective options that could help preserve horses and a healthy range environment.

5.3. TREASURED HERDS

5.3.1.1. Will this element lead to a successful strategy?

The concept of treasured herds brings with it an obligation on the part of BLM to manage those herds in a sensitive, pragmatic and cooperative manner. If BLM's handling of the recent Pryor gather is representative of how treasured herds will be managed, we are not satisfied that this element will lead to a successful strategy.

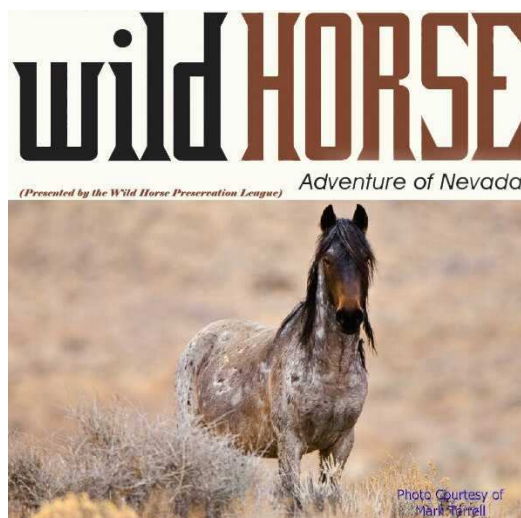
Using the Pryor situation as an example of potential failure, these horses have been gathered for decades, so the removal of excess horses is nothing new. However BLM's handling of the most recent Pryor gather started a chain of events that have adversely impacted the WHB program. The treasured herds element will not work unless the right people are assigned to it.

We **oppose** treasured herds as presently proposed. Given some of the administrative decisions made in the Wild Horse and Burro program, we can see the treasured herds concept could actually be used to justify removal of horses suffering non-treasured status. Each of the horse herds found on public lands is unique and our interpretation of the intent of Congress is that each herd is treasured.

5.3.1.2. Suggestions

About 15 years ago many BLM offices provided pamphlets describing numerous herds, their histories and maps with directions that tourists could use to safely go out on public ranges and view horses and other wildlife. Adopters were proud to have a Twin Peaks horse, a Buck and Bald horse or one from any number of HMAs. Since most people who travel miles on the range to view wild horses are horse enthusiasts, encouraging visitors to explore public lands is a passive marketing outreach.

Furthermore the Wild Horse Preservation League, using grant funds from the Nevada Commission on Tourism and Horsepower, has developed an ecotourism campaign called Wild Horse Adventure of Nevada. BLM would benefit from revamping its public lands horse viewing information and let the Wild Horse Adventure of Nevada project be the public relations engine to promote horse related ecotourism and its related benefits.



We do not see BLM in its present form seriously promoting wild horses on the range and recent actions on the part of BLM have actually harmed the Wild Horse Adventure of Nevada campaign.

5.3.1.3. Will the groups assist?

The groups in the Alliance are already assist in publishing and disseminating information relative to accessible horse herds, assisting in documentary film projects on the range and public lands, getting visitors safely out onto the range, promoting accessible herds, and promoting the Wild Horse Adventure of Nevada project.

Guiding an ITV crew to film wild horses



Sample web presentation on an advocacy site



The White River area is full of history. As early as 1882, settlers crossing this region recorded seeing bands of wild horses. With the depression of the 1930s, herds were increased by the release or escape of domestic horses from abandoned homesteads and small ranches. Today, these wild descendants share this basin with large oil and gas exploration activities and livestock grazing.



Recreational activities in the area include seasonal big game hunting, primitive camping, jeeping, horseback riding and hiking. (Sturdy shoes are needed and long pants are recommended.)

Water can be a precious commodity for people and animals. Make sure



you bring enough water on your viewing trips. Use a "good neighbor policy" when through this herd management area. Leave the gates as you find them. Please do not trespass on private lands. Private lands are marked on maps available for purchase at the BLM office in Meeker.



Main and county roads are well traveled, but BLM roads are isolated and bumpy. Dirt roads are passable for passenger cars only in good weather.

5.4. PLACING EXCESS HORSES

5.4.1.1. Will this element lead to a successful strategy?

We are not at all satisfied that this element in its present form will contribute significantly to the success of the program. For one thing, most of the personnel who really knew how to accomplish this objective have retired.

The prison training programs, makeovers, and big events are useful and reach the segment of the adoption market where potential adopters do not have the time or skills necessary to successfully gentle their animals. However this form of outreach is limited and these programs are very expensive. We are not suggesting that these programs are not beneficial or that they should be discontinued. However, the lion's share of BLM's potential adoption market involves the average adopter. Marketing to the average adopter is the most cost-effective approach for placing horses, when done correctly.

Adopters need to have reasonable expectations as to what their adoption experiences will entail and they need to understand the basic skill sets needed to be successful. In former times when greater emphasis was placed in these areas through cooperative agreements volunteer advocates and mentors, adoption rates went up, a higher percentage of adoptions were successful and the average adopter who had a successful first experience was highly likely to return and adopt one or more additional animals.

Economic conditions have an impact on adoption rates, however the greatest inhibiting factors involve BLM losing the support of horse groups and, in some cases, ineffective outreach.

Adopters developing skills at BLM's Palomino Valley Center



5.4.1.2. Suggestions

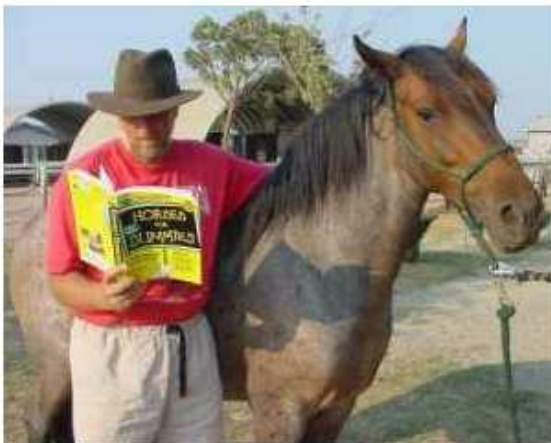
For this element to be successful, BLM first must stop alienating the horse groups. If the groups are antagonized and fighting with BLM they will commit less time and fewer resources towards encouraging and facilitating adoptions. The personnel that BLM has on the "front lines" and who interact with the public and advocates can have a significant impact on the momentum that BLM can generate for horse placement.

BLM must also understand its adoption market demographics. We are not supportive of spending money on PR firms to figure this stuff out. BLM already has personnel competent in these areas. Bob Mitchell and Gus Warr are two examples of personnel who have demonstrated adequate knowledge and effectiveness in this area.

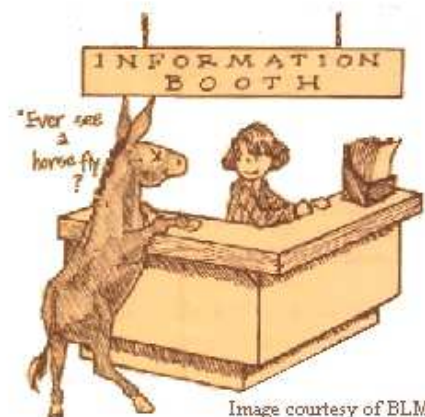
5.4.1.3. Will the groups assist?

The groups in the Alliance already assist. They promote adoptions, educate adopters, take in BLM's orphan foals and special needs horses, regularly engage in public outreach and provide web based adopter support.

Partial "screen shot" of adopter information on a group's web site.



**Wild Horse and
Burro
Help Desk**



Assistance for new adopters of BLM horses and burros and those who are considering adopting

PRE-ADOPTION INFORMATION

Considering Adopting a Wild Horse?

- Facts to consider, presented by Barbara Eustis-Cross and Nancy Bowker



5.5. COMMUNICATIONS

5.5.1.1. Will this element lead to a successful strategy?

While conceptually this element appears beneficial, we are not satisfied that in actual application it will lead to a successful strategy. With a few notable exceptions BLM has not demonstrated the necessary skill set to make this element work. Part of the problem involves infrastructure and resources. The most recent example of communications infrastructure failure involves BLM's ePlanning comment wizard associated with this Strategy Development Document. It is a nightmare in that the eComment wizard often crashes when people try to utilize it and the instructions on BLM's web site are incorrect, causing people to inadvertently erase their responses to previous questions when commenting on the next question.

BLM has been notified of these problems and as of this writing has failed to make the necessary corrections.

It is not uncommon for Advocates to call BLM facilities to verify title status and to get capture data information on horses needing rehoming and be told that the computers are down.

Until BLM gets its computer system, web based information and interactive documents to work correctly, it is premature to consider delving into Twitter, Facebook and the like.

BLM also has a small number of people in the field who treat advocates with arrogance and disdain. We are not suggesting that this conduct is representative of the majority of the personnel associated with BLM, however it has a chilling effect on open communications.

5.5.1.2. Suggestions

We had an old saying back in the 90s with respect to the adoption program. If an adopter has a good experience, a few people will know about it. If an adopter has a bad experience, everyone will know about it.

Similarly, when BLM personnel do their jobs and constructively engage the public, as most of them do, then a few people will know about it. When a BLM employee exhibits disdain and conveys an arrogant attitude, everyone knows about it.

It doesn't matter how many communication gadgets BLM tries to develop, until the human beings employed by BLM constructively and consistently engage the public, BLM will not solve its communications problems or meet the Secretary's stated objectives.

BLM needs to take serious input from personnel such as Dean Bolstad, Mark Struble, Gus Warr and Bob Mitchell. As an example, when Bob Mitchell and his crew were truly in synch the results they produced were phenomenal. Mark Struble is struggling with tough economic times in Nevada and still gets 100% adoptions on prison horse adoption day. These personnel know how to use the media and internet, but more importantly they motivate advocates and potential adopters to support the adoption program. Therein lies your answer. Get your ship right side up, then worry about charting new courses to your communications destination.

5.5.1.3. Will the groups assist?

Organizations in the Alliance already promote adoptions, take horses out for the public to preview, hold horses for the public, provide internet information services and a variety of other outreach. The groups can be effective when they have state WHB Leads that they can actually work with.

Advocates on TV promoting horse adoptions



Showing off former free-roaming horses



5.6. ANIMAL WELFARE

5.6.1.1. Will this element lead to a successful strategy?

The overall concept has value. The real issue involves how it might be implemented.

5.6.1.2. Suggestions

Two issues raised that typically pose greatest concern involve cause and effect (the effects on animals caused by particular gather strategies and operations) and continuity of care. BLM's greatest animal welfare criticisms generally stem from one or both of these issues.

It does not matter if BLM uses an APHIS veterinarian or a contract veterinarian, whomever is observing BLM gathers has to have at minimum a valid veterinary license (proving minimum competency) and have enough practical equine experience so as to unequivocally understand cause and effect and be able to proscribe effective continuity of care. The veterinarian must have significant understanding as to the effects of environmental conditions, intensity of gather activities, trap site safety, shipping issues, etc. We cannot have another repeat of the Calico.

Furthermore, large gathers appear to place unmanageable burdens on intake facilities, especially when large numbers of horses in poor condition are brought into the facilities at one time. It is too difficult for facility staff to successfully monitor so many horses, and we believe that the overloading of facilities with stressed horses has a material effect on the mortality rates that we have been seeing. The numbers of horses brought in to any facilities should never exceed the practical capabilities of the facilities to successfully care for the animals received.

BLM needs to publish contemporary "Best Management Practices" that are basically official action guides that address the various conditions and best approaches that should be applied in the field and at facilities. These Best Management Practices should be used to guide decisions made by personnel in a manner that does not prevent those personnel from making rational and justifiable decisions as may be needed based on actual conditions that they are experiencing that fall outside the recommended practices.

Every operation has to have someone present whose duties also include responsibilities over safety of personnel, animals and the public. By that statement we are not suggesting that someone assigned to be Safety Officer could not have other duties to perform, but rather that there has to be a qualified individual tasked with the responsibility to continually evaluate safety concerns and make safety decisions.

Many advocate groups appoint a "Safety Officer" for their horse events. Clearly such a concept needs to be integrated into all levels of BLM field and facility operations.

5.6.1.3. Will the groups assist?

Organizations associated with the Alliance already provides focused care for orphans, injured and special needs horses that require a greater level of attention than can be provided at BLM facilities. These groups will certainly contribute to additional successful animal welfare activities.

5.7. SCIENCE AND RESEARCH

5.7.1.1. Will this element lead to a successful strategy?

We believe that the overall concept presented is valid, but until Congress restores funding for effective monitoring, adequate hard data collection and less reactive management of wild horses, we believe that the success envisioned is not likely to occur.

BLM must enter the 21st Century with respect to advances in fertility control science. It makes no sense to deliver a program from a Model T pickup when the world is driving Dodge Ram diesels. The fertility control element is going nowhere until BLM avails itself of the latest developments.

5.7.1.2. Suggestions

Obtain sufficient funding for effective monitoring and more complete data collection. BLM cannot effectively run a program if the agency doesn't really know what is going on out on public ranges.

Contact Dr. David Thain, University of Nevada, Reno and Dr. Irwin Liu, UC Davis School of Veterinary Medicine. Learn about the advances in equine fertility control and the coming trends. Stay at the front of the pack rather than bringing up the rear.

Fertility control has to be more than just an afterthought to have any sustainable impact.

5.7.1.3. Will the groups assist?

Groups associated with the Alliance already observe fertility control treated free-roaming horses and while the science is new, the prospects are encouraging. At one time **free** GnRH based fertility control was available for both mares and colts, however BLM wasn't interested. As a result the most predominant fertility control has taken place with Virginia Range horses.

There are multiple opportunities to mitigate fertility rates on the range but BLM has to get "unstuck" to get anywhere in this regard.