

**BLM Response to National Wild Horse and Burro Advisory Board
Recommendations of February 25, 2008**

1. The National Wild Horse and Burro Advisory Board recommends that Dr. Spratling serve as a liaison to assist in the development of the Nevada Wild Horse Range Herd Management Area Plan to specifically to develop a protocol for gelding.

BLM Response: Nevada BLM contacted Dr. Spratling by letter (February 2008) and requested his assistance to develop a protocol for the gelding proposal for the Nevada Wild Horse Range (NWHR). Nevada also consulted with Dr. Kirk, Nevada Wild Horse Commission; Dr. Al Kane, USDA APHIS, Dr. Richard Sanford, contract veterinarian for the Palomino Valley Wild Horse Center, and John Neill, Palomino Valley Center Facility Manager. Input from these individuals was considered in preparing the preliminary and final Herd Area Management Plan (HMAP) Environmental Assessment for the NWHR.

Based on input from the public in response to review of the preliminary HMAP environmental assessment, the Las Vegas Field Office Manager has elected to implement a gelding component on a gradual basis during future scheduled gathers, i.e. 30-35 stallions would be gelded initially (year 2012), with an additional 65-70 stallions considered for gelding during subsequent gathers if monitoring indicates the initial pilot study is successful. Through consultation with the above veterinarians and experts, BLM established the following management and monitoring requirements to guide a pilot study for geldings as a component of the herd on the NWHR:

- ? Manage a breeding population of 240-400 animals and a non-breeding population of 60-100 geldings within any given 6-7 year period. Within the population, achieve a 60%/40% ratio of males to females immediately following future gathers. The following management requirements apply to the non-breeding population:
- ? Limit the selection of stallions for gelding to animals that are 5 and 15 years of age
- ? Limit the selection of stallions for gelding to animals that have a body condition score of 4 or above.
- ? Surgery would be performed at a temporary holding facility in the field or at a BLM managed holding center by a Nevada licensed veterinarian in good standing, using appropriate anesthetic agents and surgical techniques.
- ? When gelding is done in the field, geldings would be released near a water source approximately 24-48 hours following surgery. Gelded animals would be monitored for approximately 7-10 days post-surgery (recovery is indicated by animals moving freely to/from forage and water).
- ? When the gelding is performed at a BLM-managed facility, selected stallions would be shipped to the facility, gelded, held in a separate pen to minimize risk for disease, and returned to the range near water within 30-60 days.
- ? Gelded animals would be branded with a "G" high on their hip to minimize the potential for future recapture and to facilitate post-treatment monitoring.

Individual behavior of geldings would be observed during the first breeding season following treatment (i.e. June-October). Monitoring would be designed to determine if they interfere with breeding harems (i.e. demonstrate stallion-like behavior). Observations would be made as needed to determine the behavior of the geldings at key water locations within the core area. Observations would also be made when completing other scheduled field work.

The herd behavior of geldings post-treatment would also be observed. Anecdotal evidence suggests geldings will form bachelor bands. Monitoring will be completed to determine whether or not bachelor bands form as expected, or if geldings intermix with the breeding population.

Periodic population census, together with gather data from future gathers, will be used to determine whether or not managing a portion of the NWHR herd as geldings is effective in slowing the average annual population growth.

2. The National Wild Horse and Burro Advisory Board recommends that all states evaluate Herd Management Areas to assess horse and range conditions to identify and prioritize potential emergencies.

BLM Response: Each state with wild horse and burro management responsibility was asked to evaluate their Herd Management Areas (HMAs) to assess animal and range conditions to identify emergency gather and escalating problem HMAs. Responses from Nevada, Utah, Montana, California, and Oregon are included in Attachment 1.

Three HMAs in Nevada were identified for emergency gathers due to lack of forage and water for horse numbers that far exceed AML. These HMAs include the Nevada Wild Horse Range, North Stillwater and Fox & Lake HMAs. Gathers will begin in the Nevada Wild Horse Range and North Stillwater on about July 1st and in Fox & Lake on about August 1st.

Utah identified an area for gathering where about 50 wild horses have located on a fire rehabilitation seeding that was done for soil stabilization and wildlife habitat restoration. The horses are aggressively grazing the new seeding and irreversible damage to this expensive restoration project will occur if the animals are not removed. A gather targeting these animals is scheduled to begin on July 21st.

Montana identified horse condition and heavy range utilization issues in the Pryor Mountain Wild Horse Range. Since March 2008 wild horse body condition began to decline. Currently most stallions are in Henneke body condition score 4 while mares and yearlings are in condition class 2 and 3. Montana proposes to start bait trapping on about August 1st until 30 to 40 horses are removed. An environmental assessment has been released for a 30 day public comment period.

Other HMAs with escalating problems are being monitored closely for conditions that would trigger the need to conduct emergency gathers.

3. The Board recommends that BLM conduct a critical analysis, including cost comparison, of the following alternatives to reduce long-term holding costs: a. A national stewardship incentive adoption program;

BLM Response: A solicitation for proposals has been drafted but is on hold due to a lack of funds for the proposal. Interest in this type of proposal and its potential to increase adoptions is unknown. No estimates of cost savings due to increased adoptions have been made.

3. The Board recommends that BLM conduct a critical analysis, including cost comparison, of the following alternatives to reduce long-term holding costs:
 - b. Converting herd management areas to non-reproductive gelding herds as well as introducing geldings as a component of herds;

BLM Response:

Part 1: Converting Herd Management Areas to Non-Reproductive Gelding Herds

For the purposes of analysis and comparison, a HMA with an appropriate management level range of 400 to 700 was assumed. The management activities and estimated costs to manage a 50% male/50% female breeding herd are compared to the implementation and management of a non-reproductive herd of 700 geldings.

The WinEquus model was used to predict annual herd growth rates, removal numbers and the population size at the end of an 11 year time period for the breeding herd. Herd management and cost estimates are based on the following assumptions for the two alternatives being compared.

- Breeding Herd Management Assumptions
 - ? The HMA's AML range is 400 to 700 horses..
 - ? Gate cut removals are initiated when the herd size grows to 700 in approximately every 3 years. Removal down to the low end of AML (400) is achieved after each gather.
- Non-Breeding Herd Assumptions
 - ? The herd number upon initiation of the conversion to a non-breeding herd of geldings is 700.
 - ? During the first gather an 85% gather efficiency is achieved.
 - ? Fifty females will not be captured in the first gather and would be captured in a follow up gather several years later.
- Cost Calculation Assumptions
 - ? \$500 per head capture and removal cost.
 - ? 70% of animals removed will not be adopted and held in lifetime long term holding facilities.

If these sex ratio adjustments were considered for one half of our herds (16,000 animals), the total cost savings over a 25 year period resulting from the fewer excess horses removed during an 11 year period could range from about \$7 million to \$23 million.

The effects of geldings as a component of a herd and of an increased stallion component on herd behavior and social structure are not documented. BLM proposes to initiate several pilots involving both alternatives: geldings as a component of a herd and an increased sex ratio that favors stallions. Pilot herds would be monitored to determine the effects.

3. The Board recommends that BLM conduct a critical analysis, including cost comparison, of the following alternatives to reduce long-term holding costs:

c. Evaluate regulatory and legislative changes needed to implement instant titling.

BLM Response: Immediate transfer of ownership or "instant title" when an animal is adopted would require an amendment to the Wild Free-Roaming Horses and Burros Act of 1971. Section 3 (c) of the Act states, "Where excess animals have been transferred to a qualified individual for adoption and private maintenance pursuant to this Act and the Secretary determines that such individual has provided humane conditions, treatment and care for such animal or animals for a period of one year, the Secretary is authorized upon application by the transferee to grant title to not more than four animals to the transferee at the end of the one-year period."

It is probable that adoptions would increase with an "instant title" provision. Increased adoptions would result in cost savings for feeding and care. The cost to maintain an animal at short term holding for one year is about \$1,650 and at long term holding is about \$465 per year.