



U.S. Department of the Interior • Bureau of Land Management

Report to Congress: An Analysis of Achieving a Sustainable Wild Horse and Burro Program



Introduction

The Bureau of Land Management (BLM) provides this report, as requested by Congress in the Consolidated Appropriations Act of 2019 (Appendix A), to identify “factors for success, total funding requirements, and expected results” to improve management of wild horses and burros. This report also responds to the reporting requirements accompanying the Further Consolidated Appropriations Act of 2020, so that BLM may obligate the full amount of its appropriation. The BLM’s multiple use mission and commitment to stewarding healthy, working landscapes across the western United States provide the foundation for all the recommendations in this report. The report is further informed by a historical context that reveals an escalating challenge and the need for decisive action to reverse the harm to western landscapes and the wild horses and burros occupying them. The harm inflicted on public lands from excess wild horses and burros compounds yearly as on-range population growth rates and off-range holding costs outstrip the BLM’s ability to manage herds according to the intent of the Wild Free-Roaming Horses and Burro Act of 1971, as amended.

Pursuant to the Congressional request, this report provides further analysis that follows up to the BLM’s 2018 Report to Congress, *Management Options for a Sustainable Wild Horse and Burro Program*. The analysis focuses on Option II of that report and is intended to highlight to the appropriations committees in hypothetical resource terms the potential long-term severity of the program’s challenges. The Bureau continues to assess all managerial tools, including internal policies, procedures, and regulations, that could help reduce costs and administrative burdens in the absence of additional resources beyond the President’s FY 2021 Budget, and within the program’s non-lethal management constraints. This report is not intended to circumvent or foreshadow the President’s annual budget request process under 31 U.S.C. 11, and the resource estimates in this report should not be construed to imply Administration support for particular levels of appropriations for this program beyond FY 2021.

Background

During the 1950s, Velma B. Johnston, later known as "Wild Horse Annie," became aware of the ruthless and indiscriminate way wild horses were being treated on western rangelands. So-called "mustangers" played a major role in harvesting wild horses for commercial purposes during this time. Wild Horse Annie led a grassroots campaign, famously involving many schoolchildren to combat mustangers and other threats to wild horses and burros. Newspapers published articles about the exploitation of wild horses and burros. As noted by the Associated Press on July 15, 1959: "Seldom has an issue touched such a responsive chord." The "Wild Horse Annie Act" became Public Law 86-234 on Sept. 8, 1959, but it did not include Annie's recommendation that Congress initiate a program to protect, manage, and control wild horses and burros.

By 1971, the population of wild horses on public lands had declined significantly because of the encroachment of man and the continued impact of mustangers. In response to public outcry, Congress unanimously passed the “Wild Free-Roaming Horses and Burros Act” (Public Law 92-195) to provide for the necessary management, protection and control of wild horses and burros

on public lands. President Richard M. Nixon signed the bill into law on December 15, 1971. Since passage, the Act has been amended by Congress on four different occasions.

The BLM created the Wild Horse and Burro Program to implement the Wild-Free Roaming Horses and Burros Act. 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 the U.S. Forest Service have the responsibility to manage and protect herds in their respective jurisdictions within areas where wild horses and burros were found roaming in 1971. In addition, they were mandated to sustain a thriving natural ecological balance and multiple use as the framework for determining any actions proposed to manage them.

From the very first years of the program, the BLM looked to identify where wild horses and burros existed and how many were there. Rough estimates in the early years of the program were not very accurate and are difficult to use in any analysis; however, by 1980, estimates put the total national population at just over 60,000 animals on public lands. Over the next decade, removals (over 90,000 during that period) helped reduce that total to 45,000; however, estimates were still not as accurate as they could be. The BLM continued to look for ways to improve the surveys of animals that led to population estimates. With almost 80,000 private care placements during the 1980s, off-range populations remained relatively low. By 2000, with over 80,000 additional removals during the decade of the 1990s, the on-range population was still estimated at about 48,000. Off-range populations were less than 10,000. By 2007 (almost 74,000 animals removed between 2001 and 2007), the BLM had virtually achieved Appropriate Management Level (AML) with populations at about 28,000. Yet, with off-range holding costs increasing (almost 30,000 in holding in 2007) and private care placements beginning a decade-long trend of annual decreases, on-range removals had fallen far below growth rates. Even with increased funding between 2007 and 2014, removals had to be kept low in order to avoid off-range costs from spiraling out of control. Yet, this lack of ability to continue on-range population control management caused on-range populations to increase virtually unchecked.

In addition to removals and private care placements, the BLM spent time and effort looking into available fertility control vaccines and working with partners to develop new vaccines. The 1970s and 1980s were mainly dedicated to testing and developing these vaccines. By the early 1990s, the BLM began on the ground use of available vaccines in Nevada and expanded to other States throughout the 1990s. The wide-scale use of these population growth suppression methods was limited due to funding constraints.

This analysis focuses on the goal of achieving AML through population growth suppression methods and removals, in the context of estimated upper-end resource requirements (as was previously discussed in Option II of BLM’s 2018 report). It is important to emphasize that achieving AML is only part of the goal of the Wild and Free-Roaming Horse and Burro Act; the Act also makes BLM responsible for maintaining healthy herds and the public lands that sustain



them. As of March 1, 2019, the BLM estimates a minimum population of slightly more than 88,000 wild horses and burros within the 177 Herd Management Areas (HMA) on public lands. This number is more than three times higher than the national total AML of 26,715, with more than 80 percent (146) of the 177 HMAs now exceeding AML. If nothing were done to reduce the annual growth rate of these herds, by 2040, the BLM

estimates the on-range populations of wild horses and burros could increase to over 2.8 million. However, well before reaching this level, the WH&B population would likely become unsustainable for the lands within and adjacent to Herd Management Areas, leading to catastrophic harm to the land, to other species, and to wild horses and burros themselves.

The analysis discussed in this report assumes management of wild horse and burro herds and healthy landscapes in three phases:

- 1) Stabilize on-range population growth (over the initial 4-5 years);
- 2) Reach AML nationally (over the next decade after the first phase); and,
- 3) Maintain AML in perpetuity.

Based on survival rates, fertility statistics, lifespan (20-30 years old on the range), the current on-range population levels, and the program funding levels assumed in this report (which limits, for example, how many animals can be removed and held), the BLM estimates that wild horse and burro herds will continue to grow for the initial four to six years after this plan is enacted. For the subsequent twelve to fifteen years, as a result of population growth suppression, removals, and private care placements proposed in this report, wild horse and burro herds would decrease significantly as off-range holding increases. After about a decade of large-scale actions, the BLM's efforts would be devoted to reaching AML between years 15 – 18 through a more focused and tailored approach to each HMA.

The BLM would continue to evaluate new strategies (such as expanding animal training programs, providing financial incentives for private adoption, holding more events showcasing the availability of animals for adoption, and developing more compelling marketing strategies) to increase the placement of thousands of animals into private care via off-range corrals, satellite events, and partner placement events.

Because the BLM is statutorily prohibited from euthanizing healthy unadopted animals and/or selling animals without limitation to reach AML, the bureau is projected to expend hundreds of millions of dollars in future years to hold unplaced animals.

The following specific actions may be required over the next fifteen to eighteen years to implement the strategy described above (the initial five-year costs projected for these activities are shown in the Estimated Funding Table in Appendix B):

- Annually gather (through both helicopter and bait/water trap methods) between 20,000 and 30,000 animals, and either remove them permanently from public rangelands or

return them after application of some form of long-term temporary or permanent fertility control;

- Annually remove 18,000 to 20,000 animals permanently from public rangelands (placed into off-range holding) until AML is achieved;
- Treat (using various temporary long-term or permanent fertility control methods) 3,500 to 9,000 gathered animals annually over the initial 10 years from the time the strategy is enacted, slowly decreasing the number receiving the treatment in the last five years of the strategy;
- Annually place an estimated 6,000 - 7,000 animals into private care;
- Procure additional off-range corrals (especially for preparatory activities) and off-range pastures to care and feed for the increased number of animals removed from the range;
- Streamline transportation logistics for movement of animals;
- Identify partner organizations able and willing to facilitate private care placements and house/care for as many of the 18,000-20,000 permanently removed off-range animals as possible; and
- Continue research into improving long-term fertility control treatments and humane permanent sterilization (with a particular emphasis on modern chemical sterilization methods).

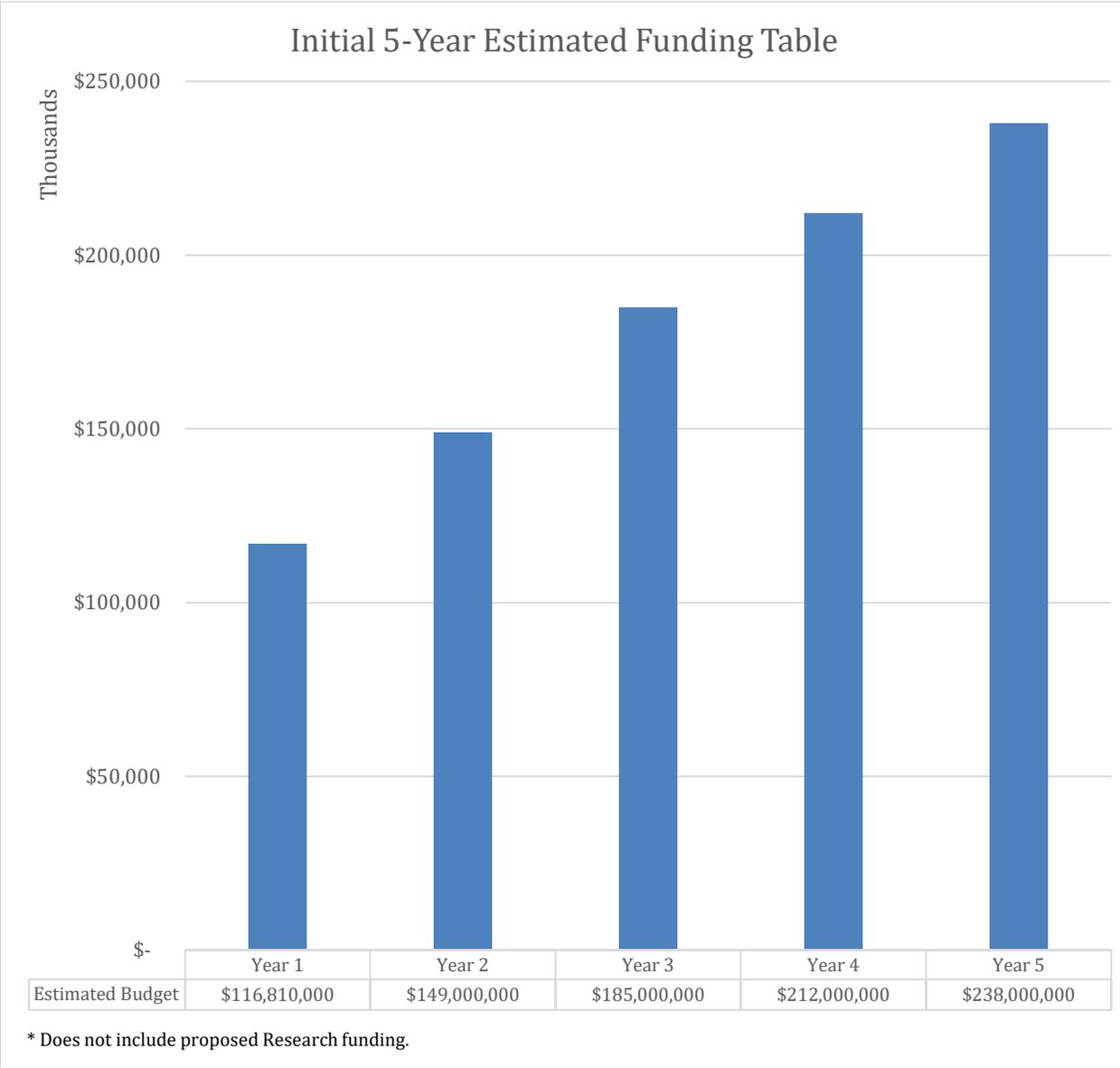
Between 2011 and 2019, Congress appropriated \$70-\$80 million annually for the Wild Horse and Burro Program, but in order to manage the wild horses and burros, funds from other resource programs (for example, programs that benefit from WH&B management actions, amounting to approximately \$13 million over the past 8 years) were also used by the Program, so the total annual BLM obligations directly or indirectly related to this program, were approximately \$80 million annually. This report projects funding required to implement this strategy. Over the next 15-18 years, even with private care placements increasing, off-range holding (corrals and pastures) costs could rise dramatically from about \$65.5 million in FY 2020 to about \$360 million by the time AML is achieved. When AML is achieved under this strategy, these costs would start to decline. Program costs (including program management, research, monitoring, etc.) will rise steadily (from almost \$117 million) due to inflation, added holding requirements, and additional activities related to population growth suppression. Once AML is achieved, the overall budget needs would begin to decrease as holding costs and on-range activities are reduced. On-range management activities to control growth rates and off-range management activities would continue even after achieving AML.

BLM continues to evaluate the varying the mix of activities related to this program in order to understand how changes in removals, adoptions, off-range corrals, off-range pasture, and permanent and temporary fertility control techniques might affect the size and timing of annual funding projections. The analysis suggests the most effective way to achieve AML levels West-wide is to annually remove a large number of animals permanently from the range, especially since a high percentage of mares captured are pregnant at the time of capture. The number of

animals annually removed is the dominant variable controlling total program costs. Therefore, the annual projected removals are critical to containing program costs and achieving AML.

Once AML is achieved in particular HMAs, fertility control would become a relatively more cost-effective strategy, with permanent sterilization options being more cost-effective in the long run than temporary sterilization which must be repeated.

The other variable that has a significant impact on overall program cost is the balance between off-range corrals and off-range pasture, with off-range pasture being about half the cost per animal compared to corrals. BLM cost projections assume that the number of animals kept in pastures will be three times the number kept in corrals. The ratio of animals in pastures to corrals is constrained by two considerations; captured animals are temporarily housed in corrals before they can be transferred to pastures, and it is not clear that the supply of pastures can be significantly scaled up without cooperative public-private pasture agreements or a significant increase in the price that the market will demand for pasture. As demand for pastures increases it is likely the market-clearing price for new pasture will also increase. Therefore, BLM assumes the cost of research into sterilization techniques is essentially held constant for the period of analysis, because by its very nature it is difficult to predict when or if a research breakthrough may affect the cost of other activities in the program.



These projections of the future costs to BLM are founded on the program’s primary cost drivers, as detailed in the remainder of this analysis (off-range care and feeding) and the assumption that BLM would begin implementing this plan within the next 12 months. Advances in as yet undiscovered temporary and long-term fertility control efficacy and duration or humane permanent sterilization methods could significantly decrease program costs. These

cost reductions cannot be quantified until these advances are identified and tested. However, every year of delay in resolving this issue only increases the single greatest cost to the program –

the care and feeding of increasing numbers of wild horses and burros in off-range corrals and pastures – and the length of time to achieve AML.

The BLM has learned through years of experience about:

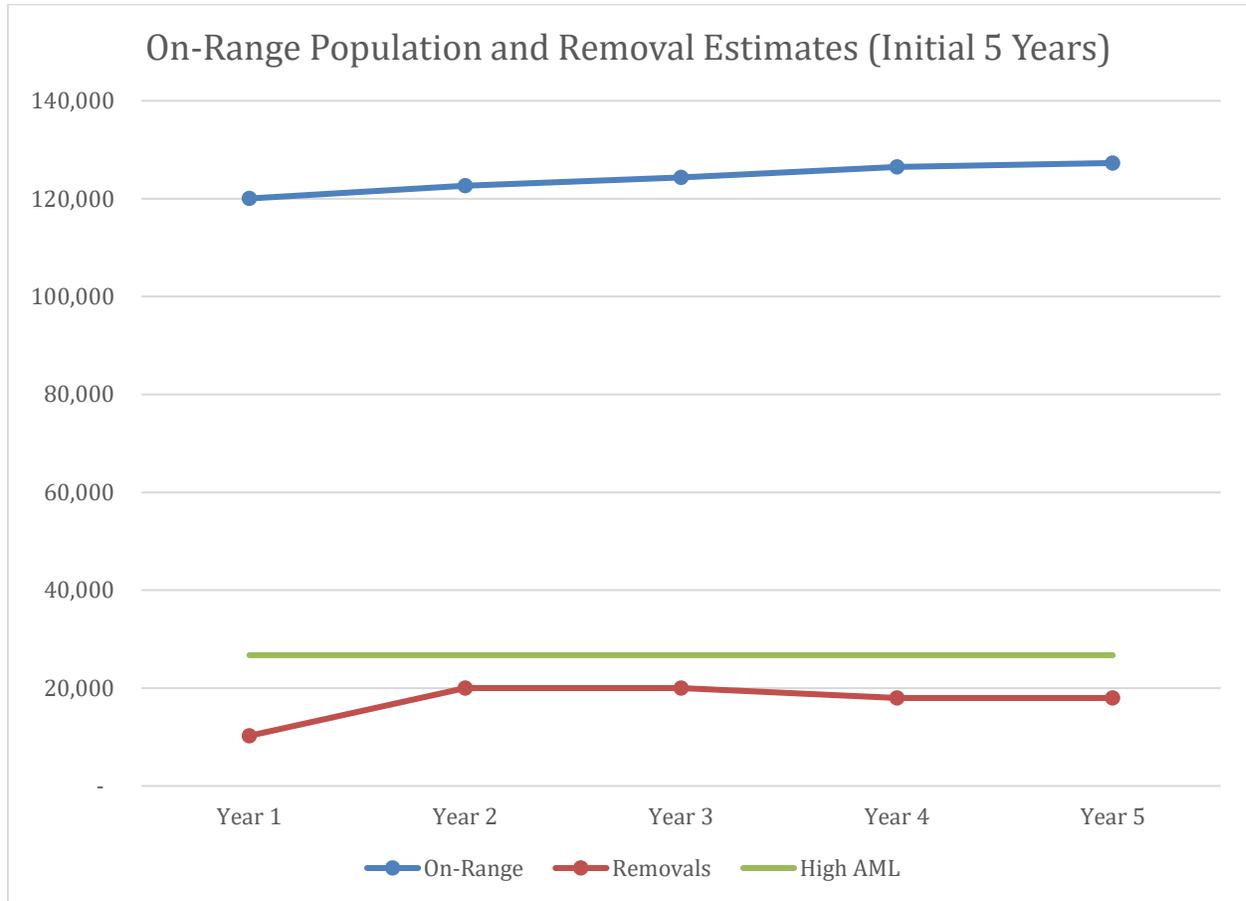
- Methods for population estimates;
- Fertility control vaccines;
- Safety of gather operations for both animals and the people working them;
- Monitoring data for determining land health; and
- Off-range care.

The BLM could use this experience to achieve AML across all HMAs. In the initial years under this analysis, population growth suppression, removals, private care placements, and off-range holding will continue to be the primary activities within the program. Achieving AML and caring for horses and burros off-range would require significant annual funding increases during the initial 10-20 years to fully realize the BLM's responsibilities under the Act. However, achieving AML is only half the goal. Keeping healthy herds on healthy landscapes after AML is achieved will take considerable effort to suppress population growth, place animals into private care, and help the landscape recover from the effects of overpopulation.

The following pages detail the components of this analysis.

Removals

With wild horse and burro populations in most HMAs far exceeding AML, removals that exceed the annual foal recruitment (i.e., birth) rate, sustained over several years, is the only effective way to immediately reduce populations. This analysis assumes annual removals of 18,000 – 20,000 wild horses and burros after an initial year of increasing capacity as further described in this strategy and until AML is achieved. The BLM utilizes two main methods of gathering animals: helicopter and bait/water trap.



When discussing removals on a national scale, the BLM combines wild horses and burros numbers. Many burro removal operations use BLM personnel for bait/water trapping, which are less expensive than contracted removals. This is due primarily to the ecosystems in which most burros are found and that burros tend to be less trap shy than horses.

It has been suggested in other reports that the BLM combine removals and fertility control in gather operations to immediately reduce population sizes and decrease population growth rates. This approach is most effective when employed in

HMAAs that are at or near AML. However, in HMAAs where the population is far above AML, multiple gathers over several years would be necessary to achieve AML. In these cases, it is more effective to simply remove as many animals as can be gathered. Once these HMAAs reach or are close to AML, then fertility control treatments can be employed more effectively to maintain AML. This is true for two main reasons:

- Most gathered mares are pregnant and even if treated will still give birth to that foal. This would add an animal to the on-range population (half of which would be breeding mares in just a couple years) even if that same mare were gathered or re-treated in a future year; and
- Without first getting close to AML, emphasizing fertility control would significantly prolong the number of years it takes the WHB Program to achieve AML, thus increasing costs for the on-range management activities into the future.

As long as wild horse and burro populations on most HMAAs far exceed AML, increased removals are the best method of immediately reducing population toward achieving AML. With animals living to 20-30 years old on the range, even a non-reproducing herd that is 100 percent above AML could take 15 or more years to reach AML through natural mortality alone.

Factors for Success: To remove the number of animals to meet the objectives under this analysis, the BLM would need to:

- Increase the number of corral facilities by 3-4 with about 8,000 new spaces (this includes facilities/spaces potentially added through FY2020 solicitation), with appropriate personnel (2-3 employees per new corral), to receive animals removed from the range and prepare them for adoption, sale, or holding;
- Annually increase the amount of long-term pasture holding space by about 12-14,000 in the first six years, then about 9-11,000 until AML is achieved;
- Increase the number of contractors that perform gathers (both helicopter and bait/water/trap) by 2-3 to a total of 8-9 contracted employees;
- Provide additional removal support staff from other BLM support staff (15-20 additional, including Law enforcement, Public Affairs, Wild Horse Specialists, etc), such as dedicated contracting officers (2-3 additional); and
- Increase other BLM personnel to support gather operations, staffing for transportation logistics, and other key areas (see Pastures and Corrals sections for new staffing requirements indirectly related to removals).



Expected Results: The BLM anticipates it will take up to 20 years to reach the AML of 27,000 wild horses and burros on the range across the West by annually removing 18,000 – 20,000 animals. The BLM would then be responsible for the care and feeding of tens of thousands of additional wild horses and burros in holding facilities, which will significantly increase costs.

Funding Assumptions: The estimates in this analysis are intended to identify to the committees the severity of the program challenges in potential resource terms. These estimates should not be construed to imply Administration support for particular levels of appropriations for this program beyond FY 2021.

Under this analysis, to gather and remove over 10,000 animals in the initial year, then increasing to 18,000 – 20,000 animals annually until AML is achieved, the BLM would require funding at an estimated \$9 million (about \$850 per animal) in the initial year, increasing to roughly \$18 million in year 2 and then after year 4 continuing at about \$20 million each fiscal year until a slowdown occurs leading up to achieving AML. See the Estimated Funding Table in Appendix B. Thereafter, removals and overall costs would be reduced.

Population Growth Suppression

Temporary

Temporary fertility control methods used by the BLM for animals on the range are mainly vaccines. The BLM has relied primarily upon *Porcine zona pellucida* (PZP), which has a 90 percent efficacy rate, but is only effective for one year. Therefore, mares must be treated **every year** to remain infertile. Recently, the BLM has been funding research into the effectiveness of the vaccine GonaCon. It has an efficacy rate of 30-40 percent in the first year; however, if a booster is applied within 6-18 months of the initial treatment, its efficacy rate increases up to 90 percent for the next 4-5 years. This would result in an estimated cost of about \$12,000 to keep a mare infertile for a lifetime using this vaccine and assuming that the mare could be re-captured every 5 years. To apply the booster, the BLM may either re-gather the treated mares or hold them for at least six months and then apply the booster. Although the BLM will continue to use PZP, especially where darting of PZP occurs and has shown to be successful, the BLM plans to significantly expand the use of GonaCon. This approach represents an excellent example of research investments leading to future year savings. As such, the BLM continues with research into this critical component of on-range management. As new and innovative solutions to population control suppression become available through this research, the BLM will implement them as appropriate. These innovations could help drive down long-term costs by reducing the need for multiple gathers.

Although the BLM must complete critical resource management planning and National Environmental Policy Act (NEPA) reviews to implement a gather schedule that includes removals and population growth suppression treatments, the BLM seeks to streamline NEPA compliance. For example, the BLM recently awarded an Indefinite Delivery Indefinite Quantity (IDIQ) contract to several vendors who can perform these NEPA related services on schedule. However, if existing NEPA analysis does not address newly available fertility control methods, the BLM would likely need to complete new analyses before utilizing those methods.

Factors for Success: To implement an effective temporary fertility control program, the BLM would:

- Increase the number of contractors that can perform gather operations (2-3 contract employees to as many as 9 contract employees);
- Add support from other BLM staff outside the Program, such as dedicated contracting officers (15 to 29 additional employees);
- Contract with vendors to complete timely NEPA requirements (potentially between \$500,000 to \$1 million annually);
- Increase other BLM personnel to gather operations, staffing for transportation logistics, and other key areas; and
- Contract with providers to increase dosage production of the required vaccines (from about \$30,000 annually to about \$400,000 annually for the vaccine doses only).

Expected Results: The wide-scale application of PZP and GonaCon, or other longer-term fertility control vaccines, in concert with the large number of removals will begin the slow process of stabilizing, then reducing populations on the range. Using only short-term fertility control vaccines at any scale, however, **will not** significantly reduce the on-range population.

Funding Assumptions: The estimates in this analysis are intended to identify to the committees the severity of the program challenges in potential resource terms. These estimates should not be construed to imply Administration support for particular levels of appropriations for this program beyond FY 2021.

To expand the application of temporary population growth suppression, the BLM must gather, treat, and release animals. The BLM must gather approximately twice as many animals as those treated (50 percent of the population are mares and 90 percent of those are of treatable age). These costs are approximately \$2,500 per mare treated, which includes all gather, treatments, and short-term holding costs. Costs for temporary population growth suppression will be approximately \$8 million in the initial year (with a goal to treat more than triple the number of mares in recent years). As resources are acquired to accommodate increased fertility control treatments, this amount would increase to approximately \$21 million by year 3. See the Estimated Funding Table in Appendix B. These costs would begin to decrease as AML is achieved in individual HMAs and the multiple year effectiveness of GonaCon comes into effect.

It should also be noted that temporary fertility control is less effective over time because animals become more difficult to gather the more attempts that are made. For example, in the case of GonaCon, where a booster shot is required after at least 6 months, the BLM anticipates only 70 percent of the mares treated with the first shot will be recaptured or darted (where feasible) in the following year for treatment with the booster. The feasibility of PZP is worse because the annual treatment of large numbers of animals will become logistically infeasible and increasingly expensive as annual re-capture rates decrease since gathers will be required every year using this treatment method.

Permanent Sterilization

While gelding (i.e., castration) is used on virtually all stallions removed from the range, it is rarely used as a population growth suppression technique for herds on the range. Due to the reproductive nature of wild horses and burros, over 80 percent of males in a herd would have to be gelded to stabilize population growth. Permanently sterilizing females is the most effective growth suppression method; one treatment results in a lifetime of infertility. Thus, permanent sterilization is a better financial and more humane solution than long-term temporary fertility control growth suppression that require repeated gathers. At the same time, the BLM recognizes that in order to achieve a thriving natural ecological balance, it is important to balance stability in population with herd genetics and habitat health.

The BLM continues to view permanent sterilization methods as one tool for achieving and sustaining AML on specific HMAs, and as a potential tool for creating and managing for non-reproducing herds in other HMAs. In addition, the BLM could continue work with organizations on research into non-surgical permanent sterilization methods. This research is critical to understand both the effects of the methods on the animals themselves, and whether these methods produce behavioral or social changes within herds. The BLM is committed to ensuring that all potential population growth suppression methods are humane and effective.

Factors for Success: The BLM needs the services of enough trained veterinarians to sterilize hundreds of animals annually. The BLM is currently reviewing responses to a Request for Information related to surgical permanent sterilization methods. These responses will better inform the BLM on humane ways to utilize this tool in conjunction with removals and temporary population growth suppression methods.

Expected Results: Over time, as animals are humanely sterilized, this will reduce the number of gathers required to maintain AML. Using sterilization, at appropriate levels, on herds at or near AML can lead to greatly reduced out-year costs as the need for gathers and off-range holding are essentially eliminated.

Funding Assumptions: The estimates in this analysis are intended to identify to the committees the severity of the program challenges in potential resource terms. These estimates should not be construed to imply Administration support for particular levels of appropriations for this program beyond FY 2021.

The BLM estimates it costs about \$3,200 to surgically sterilize a male-female pair, which includes the costs to gather, treat, and hold the animals for some time before releasing them. Though the initial costs to sterilize a female is higher than treating her with temporary population growth suppression, long-term costs are lower with permanent sterilization and may be more humane because animals do not need to be recaptured and periodically retreated.

Costs for permanent population growth suppression will be relatively low in the initial years and increase as the BLM determines that specific methods are safe and humane. In later years, costs would decrease as AML is achieved in individual HMAs and the number of mares on the range that are permanently infertile reaches a level necessary to maintain a population equilibrium.

Private Care Placement

Adoptions, Sales, and Transfers

Adoptions have long been BLM's primary method of placing excess animals into private care. Over the past few years, the BLM has identified innovative ways to increase adoptions, which has helped reverse a long-term trend of reduced adoptions. In fact, the BLM has increased overall private care placements annually over the past four years. In an effort to continue this trend, the BLM implemented a new Adoption Incentive Program (AIP) in FY 2019, which offers qualified adopters of untrained animals a payment of \$500 within 60 days of the adoption and another \$500 within 60 days after receiving the title of the animal (typically one year later). This program has shown promise to significantly increase adoptions of untrained wild horses and burros.

Sales have increased considerably over the past few years. Many BLM partners who train and offer animals to the public (or retain for their own use) prefer purchasing a wild horse or burro through the Sale Program in order to obtain ownership immediately. The BLM's Online Corral is also improving the ease with which people can find suitable animals for adoption and sale. This online presence has been an effective tool for those who are not conveniently located near an adoption event site and/or are accustomed to using the internet for their other purchases. The BLM continues to explore ways to further its outreach through innovative marketing and branding of the Program. Partnering with other animal welfare groups will help place more animals.

The third method the BLM has available to place animals is the transfer program. In 2017, Congress authorized the BLM to transfer excess wild horses and burros to Federal, state, and local agencies as work animals. Once transferred these animals lose their protections under the Act. The BLM continues to explore opportunities to expand this program to transfer animals to agencies to be used as work animals.

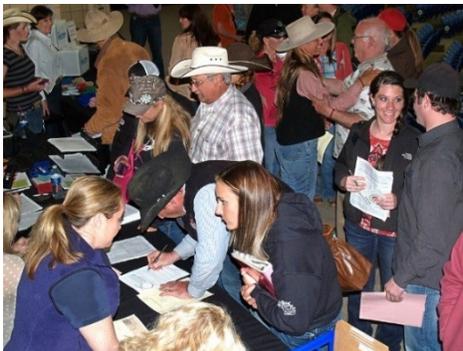


Factors for Success: In order to successfully continue to increase the placement of animals into private care, the BLM would:

- Increase the number of partners (i.e. training partners and specialty markets) and facilities that can aid in the placement process;
- Add support from other BLM staff, such as dedicated contracting officers and grant officers; and
- Increase BLM personnel (5-6 new staff) to support adoption and sale events, animal transportation, and the transfer program.

Expected Results: The BLM could continue efforts to place 6,000 - 7,000 animals per year over the initial 7-10 years of this strategy. Variables affecting performance include continued success of adoption incentives over time, and the general health of the economy, which can affect individuals' willingness to adopt. As with removals, the number of private care placements is usually presented as a combined number for both wild horses and burros. However, burros are fewer in number, easier to place, and less costly to place in private care than horses.

Funding Needs: The estimates in this analysis are intended to identify to the committees the severity of program challenges in potential resource terms. These estimates should not be construed to imply Administration support for particular levels of appropriations for this program beyond FY 2021.



The average cost (shipping, advertising, staff, etc.) of placing an animal into private care has decreased over the past few years. It is about \$1,500 per animal placed (not including the \$1,000 for the AIP). These costs would likely increase due to additional AIP placements; however, these additional costs would eventually flatten out and will be offset by long-term savings in reduced holding costs for the AIP animals. As shown in the table at Appendix B, the cost of private care placements would be approximately

\$11 million in the initial year. They would then increase each fiscal year as more animals are placed into private care and as a result of inflation. In addition, the BLM would continue to fund partners, who supplement the BLM's efforts to place animals into private care.

Compliance Inspections

Compliance inspections on animals that have been adopted occur throughout the country and are completed before they are titled. Currently, the BLM requires mandatory compliance inspections in three circumstances: where more than 25 adopted animals are housed, where the adopter participated in the AIP, or where there are reports of potential abuse or neglect. Inspections are completed by BLM staff, authorized trained volunteers, or certified veterinarians.

Factors for Success: A successful compliance program for the increased number of animals placed into private care, requires:

- An increase in the number of staff, partners, and volunteers who are trained and able to do compliance checks;
- Additional support from other BLM staff, such as grant officers; and
- Efforts to make compliance checks less costly.

Expected Results: The BLM would expect to complete inspections on all adopted animals, with an emphasis on animals adopted through the AIP.

Funding Needs: The BLM expended approximately \$500,000 annually for compliance inspections over the past 5 years. To monitor animal health under the AIP, the BLM plans to increase the number of compliance inspections, which would increase costs to about \$1 million annually beginning in the initial year and rise with inflation thereafter.

Euthanasia

The BLM is prohibited from euthanizing healthy wild horses and burros by the annual Department of the Interior appropriations acts.

Sale without Limitation

The BLM is prohibited from implementing a strategy to include sales of wild horses and burros without limitation by the annual Department of the Interior appropriations acts.

Off-Range Care

Off-range Corrals

The BLM has two different types of off-range corrals: preparatory and maintenance. Preparatory facilities receive animals directly from the range. The animals become acclimated to living off the range; receive vaccine and dewormer treatments; obtain their identifying freemark and/or microchip; and stallions are gelded in these facilities. With up to 70 percent of the mares removed from the range being pregnant, their foals are added to the off-range population total. In order to accommodate the level of removals in achieving AML, the BLM must have preparatory facilities in key locations throughout the West. In addition, preparatory facilities often perform the same function as maintenance facilities. Acquiring more preparatory facilities, in key western locations, will be essential if BLM is to remove the number of animals proposed in this strategy.

Maintenance facilities house and care for animals before they are sent to adoption/sale events, placed into private care, or moved to longer-term facilities (off-range pastures). Off-range corrals are twice as costly as off-range pastures. The BLM anticipates about twice as many animals in off-range corrals as anticipated number of private care placements over the coming year in order to ensure availability of animals for events and training partners. Additional

maintenance facilities, located in key areas throughout the United States, would most likely be needed.

Factors for Success: For the BLM to acquire enough space to accommodate all the animals proposed for removal, the BLM would need to:

- Increase the number of staff and partners in BLM-operated facilities (10-12 additional employee), staff that oversee contracted facilities, and inspection officers;
- Add support from other BLM staff, such as dedicated contract and grant officers (1 additional employee); and
- Release new solicitations annually that would attract facility owners who are willing and able to care and house wild horses and burros.



Expected Results: With the increased removals in the initial year, the BLM could greatly increase its off-range corral population, initially in preparatory facilities before these animals are either moved into other facilities or placed into private care.

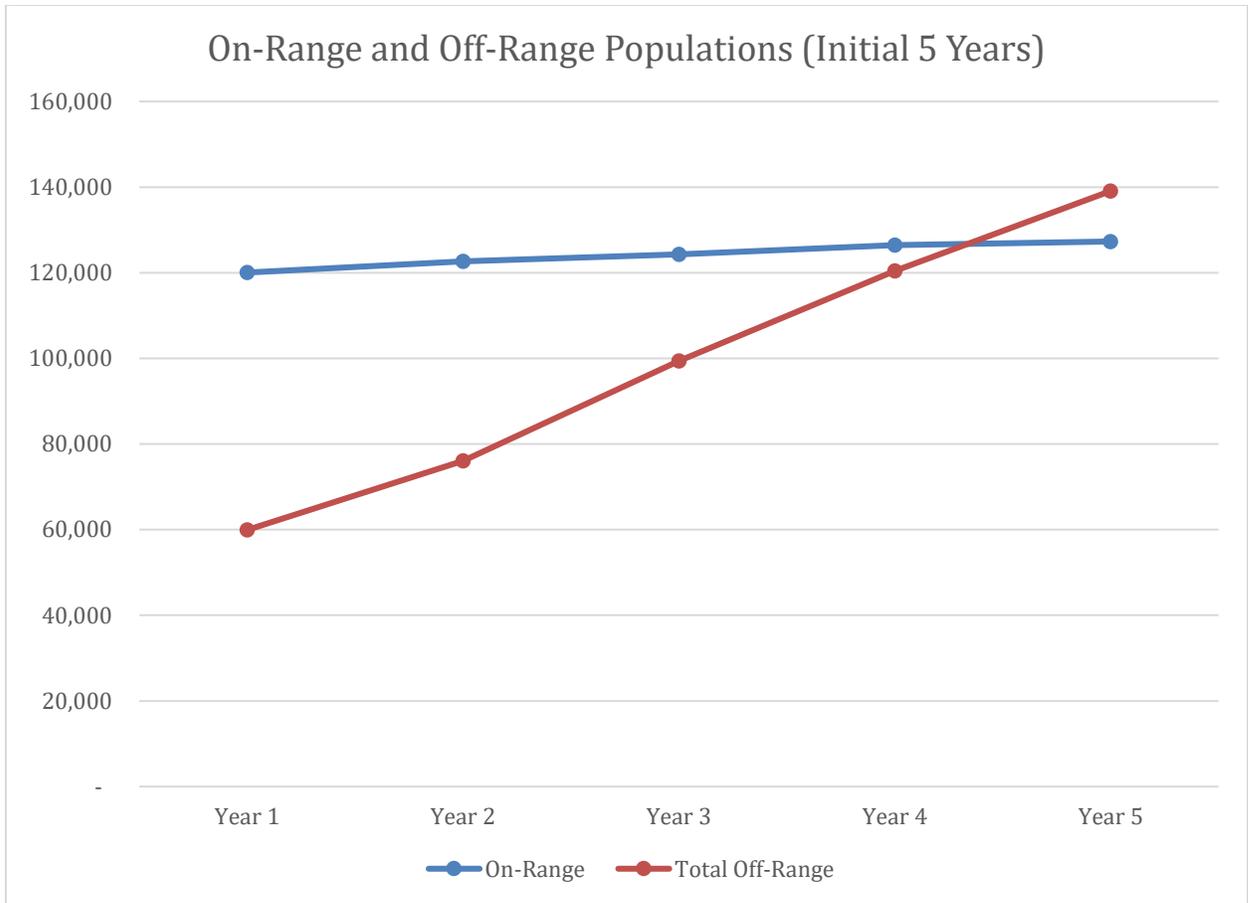
Funding Assumptions: The estimates in this analysis are intended to identify to the committees the severity of the program challenges in potential resource terms. These estimates should not be construed to imply Administration support for particular levels of appropriations for this program beyond FY 2021.

As indicated in the Estimated Funding Table in Appendix B, initial year costs would be about \$28 million. These costs would increase to \$43 million in Year 3 and \$56 million in Year 4; thereafter, increases of \$9-10 million annually would continue as long as at least 18,000 animals



(plus 5-6,000 foals that are born to pregnant mares) are removed from the range each year. These costs would also be highly dependent upon the number of additional off-range pasture spaces that the BLM could acquire. This analysis assumes that additional pasture space will be available at prices comparable to what the BLM is paying today. Holding costs could be significantly higher if these animals needed

to spend additional time in off-range corrals before additional off-range pastures can be acquired, or if off-range pasture space becomes prohibitively expensive for the BLM.



Off-range Pastures



Off-range pastures are meant to replicate some of the attributes of open range for animals. They are wide-open spaces, mostly located on private lands in the Great Plains States, where animals can roam freely, feed on natural grasses, and have adequate water supplies. Supplemental hay is sometimes provided to these animals, such as in

drought conditions when a lower overall quantity of feed is available to the animals on the pasture itself, and during the winter months to ensure quality animal condition is maintained. Animals held at off-range pastures, on average, are primarily over 10 years old and/or animals that have failed to be adopted despite at least three attempts. Since BLM can more easily place most burros it removes from the range into private care, there are no off-range pasture facilities for burros.

This is one area where the BLM has asked for partners to step in and help provide low to no-cost long-term care for animals off the range, and is a key component of a proposal that has been put forward by a broad group of stakeholders. While many organizations have voiced support for such activities, no group has come forward with a specific offer to BLM to take on this responsibility on their own. To date, all plans presented to the BLM have included the BLM continuing to pay for these services (often at a higher cost than it currently pays) and keeping ownership of the animals in the BLM's hands.

Factors for Success: With an increase in the number of excess animals being removed, the BLM would need to:

- Acquire enough additional pasture space (for over 220,000 animals by Year 10 - by about 12-14,000 in the first six years, then about 9-11,000 until AML is achieved) to hold and care for excess animals removed from the range, which will be a challenge;
- Attract landowners able to participate who will keep costs at current levels. Unit costs have remained relatively steady over the past few years; however, with increased capacity needs, this could easily change;
- Add additional staff, such as project inspectors (about 12-15 additional employees) and contracting personnel (about 14-16 additional employees) to cover the additional pasture locations;
- Increase NEPA related staff for annual new pastures (3-4 additional employees);
- Increase support staff to track funding and perform administrative duties (2-3 additional employees); and
- Add relocation team (3-5 employees) to move animals from pastures that close into new pastures.

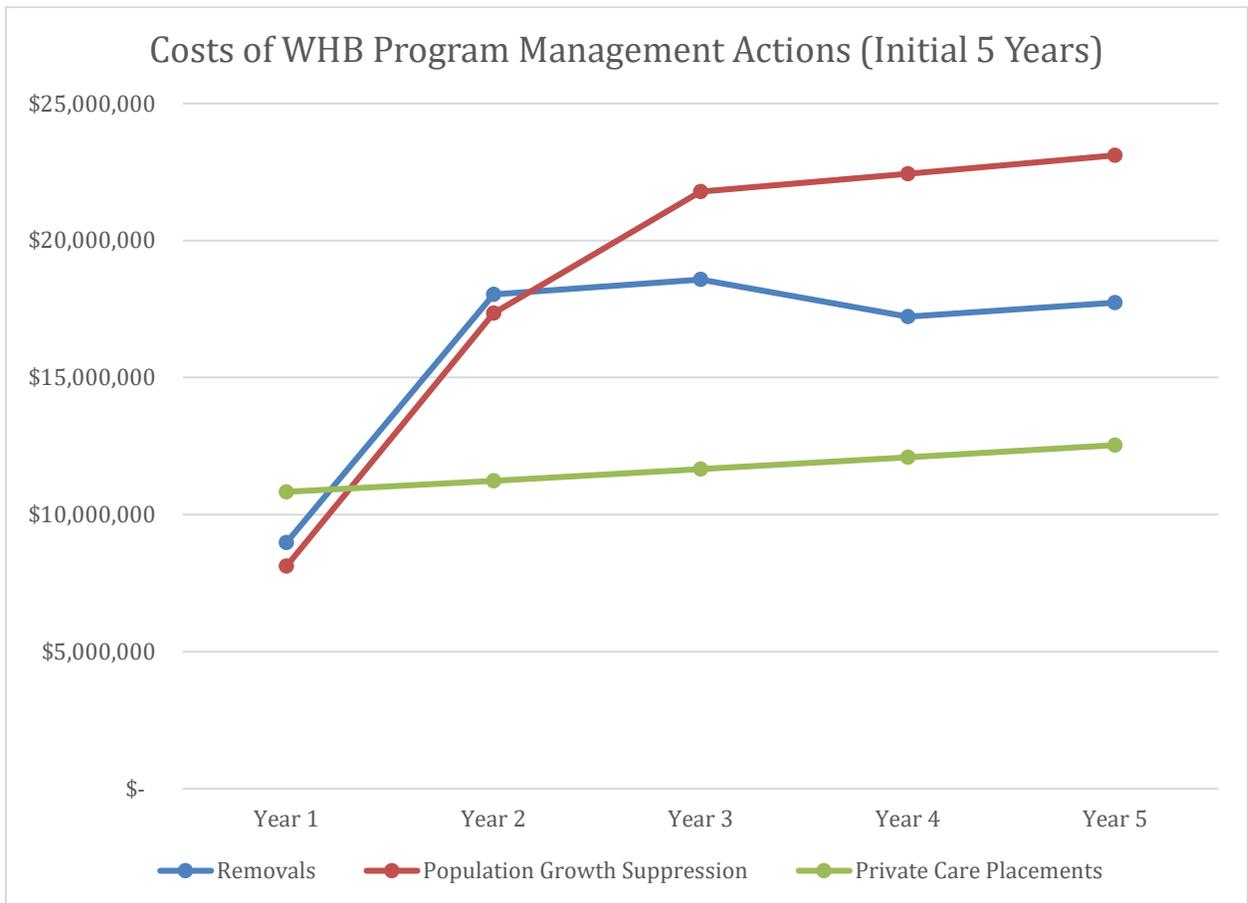
Expected Results: Given that the care and housing of these animals remains BLM's responsibility, planning for future costs at this point must include the full costs necessary to house these animals for the rest of their lives. In order to prepare for large scale removals into the future, the BLM has issued a solicitation for additional off-range pasture space that it will award in FY 2020.

Funding Assumptions: The estimates in this analysis are intended to identify to the committees the severity of the program challenges in potential resource terms. These estimates should not be construed to imply Administration support for particular levels of appropriations for this program beyond FY 2021.



Off-range pasture costs would be about \$37million in the initial year. Cost increases of about \$14 -16 million a year would continue as long as at least 18,000 animals are removed from the range each year. It should be noted, however, that as the BLM increases the number of animals cared for off-range the long-term effects on competition and market costs are unknown. With potentially more than 250,000 animals being held in off-range pastures, a spike in daily feed rates could

dramatically increase out-year funding needs. This analysis assumes that pasture space will be available at prices comparable to what the BLM is paying today with modest inflation factors only.



Resource Monitoring

In order to evaluate AML and analyze potential on-range management actions, the BLM utilizes monitoring data to gauge changes in land and animal health. Resource monitoring expenditures within the program are relatively small; however, the Program also has access to monitoring data collected by other BLM programs, such as Range Management and Fish and Wildlife Conservation, which can be used to evaluate and analyze on-range management actions.

Factors for Success: For the BLM to implement an effective monitoring program, the BLM would need to:

- Increase the number of staff (about 15-18 employees) and partners available for monitoring efforts;
- Add support from other BLM staff (1 additional employee), such as dedicated contract and grant officers; and
- Streamline monitoring efforts by other programs in areas that overlap with HMAs.

Expected Results: Increasing data collection capabilities within the Program would help improve the understanding of the relationship between wild horse and burro populations and land health.

Funding Assumptions: The estimates in this analysis are intended to identify to the committees the severity of the program challenges in potential resource terms. These estimates should not be construed to imply Administration support for particular levels of appropriations for this program beyond FY 2021.

In the recent past, the BLM has expended about \$2 million annually for monitoring of landscape conditions and animal health. With increased removals and planning efforts, the BLM would anticipate a larger need for monitoring data to support decision-making on the ground. For the initial year, the BLM would need about \$4 million for monitoring resource condition and trends. This cost would increase with inflation into the future.

Population Surveys

Accurate and repeatable population surveys are vital to inform the BLM of herd size and to evaluate the outcomes of management actions. In order to determine removal and treatment levels within an HMA, for example, the BLM must start with accurate and current population estimates. The BLM attempts to survey each HMA every 3 years; however, due to funding and workforce constraints, this is not always possible. Over the past 15 years, the BLM has continuously worked with the U.S. Geological Survey to improve BLM's science-based survey methods.

Factors for Success: In order to implement an effective monitoring program, the BLM would need to:

- Increase the number of staff and partners (2 additional employees) for survey operations;

- Add support from other BLM staff (1 additional employee), such as dedicated contract and grant officers; and
- Focus survey efforts annually on HMAs where planned actions are going to be taking place within the next year or two.

Expected Results: Moving forward with an increased removal and treatment schedule, the BLM would require increased funding to complete surveys for each HMA every three years, thus keeping population estimates as accurate as possible.

Funding Assumptions: The estimates in this analysis are intended to identify to the committees the severity of the program challenges in potential resource terms. These estimates should not be construed to imply Administration support for particular levels of appropriations for this program beyond FY 2021.

Over the past several years, the BLM has averaged about \$1.2 million in survey costs annually. Just as with monitoring, the BLM would require more surveys to support decisions for gathers and AML evaluation. The BLM would need about \$2 million for surveys in the initial year, which would increase due to inflation in the years beyond that.

Herd Management Area Plan Development

Every major management activity that occurs on HMAs starts with the NEPA process. Herd Management Area Plans (HMAPs) summarize the management goals for an HMA and the anticipated actions required to achieve those goals. For many HMAs, the BLM needs to develop and/or update HMAPs to include the use of new and improved population growth suppression methods and population management goals. In addition, these plans need to consider new research results and the potential for changes to AML. The process of developing and updating these plans would continue to provide the opportunity to inform and involve the public in determining the best actions to take on an HMA into the future.

Just as with surveys and monitoring, HMAP development is a key component in the decision-making process for BLM's wild horse and burro management activities on the ground. In addition, these documents often include public involvement through the NEPA process. To accommodate the level of removals and fertility control treatments projected over the next decade and beyond, the BLM would need to develop or update more plans.

Factors for Success: In order to complete all new and revised HMAPs, the BLM would need to:

- Add staffing or contractors for NEPA related to HMAP efforts;
- Add support from other BLM business areas, such as dedicated contracting officers; and
- Continue to look for ways to make the NEPA process shorter, with more local involvement, and less expensive. The BLM is already developing proposed categorical exclusions to NEPA.

Expected Results: Completing all HMAPs required to implement on-the-ground activities, based on the results of those plans.

Funding Assumptions: The estimates in this analysis are intended to identify to the committees the severity of the program challenges in potential resource terms. These estimates should not be construed to imply Administration support for particular levels of appropriations for this program beyond FY 2021.

Over the past several years, the BLM expended about \$400,000 annually on these plans. In the initial year, the BLM will see increased activity in this area and planning costs will be about \$1 million annually.

Research

Consistent funding for research could lead to breakthroughs in longer-lasting fertility control and sterilization methods, which could significantly reduce wild horse and burro herd growth rates and out-year management costs. The BLM used 2015 appropriations to fund multiple fertility control method studies that spanned multiple years, including studies of silicone intrauterine devices, experimental sterilization vaccines, and determinations of the correct timing to booster fertility control vaccines to increase their long-term effectiveness. Future research and adaptive management should focus on promoting development of new methods, bringing promising approaches to the field and determining whether their use is effective. While most studies into fertility control methods have focused on wild horse vaccines, the BLM is increasing its research into fertility control for wild burros as well.

While removals are the most effective way to reduce population size immediately, science-based demographic models clearly point to mare sterilization as the most direct way to reduce herd growth rates. Despite this, the BLM's attempts to study the outcomes of mare sterilization via spaying have consistently been slowed by litigation.

Additional research would greatly enhance the BLM's ability to continue its efforts to reduce populations while determining new and innovative ways to place those off-range animals into private care. This research could lead to significant long-term cost savings and more than pay for itself.

Factors for Success: Identifying organizations, universities and others who are willing and able to assist the BLM in implementing this strategy.

Expected Results: Research results will focus on projects with the potential to lower costs and create greater efficiencies for BLM's management of wild horses and burros.

Funding Assumptions: The estimates in this analysis are intended to identify to the committees the severity of the program challenges in potential resource terms. These estimates should not be construed to imply Administration support for particular levels of appropriations for this program beyond FY 2021.

The BLM estimates that research for new temporary vaccines and sterilization methods would cost up to \$20 million, which is not reflected in this analysis funding assumptions. The BLM would look for cost savings in the removal costs which could be used toward research focused on population growth suppression and other related on-range management.

Rangeland Restoration and Rehabilitation

The overpopulation of wild horses and burros, in some areas, has negatively affected the health of rangelands and contributed to soil loss, loss of biodiversity, competition with wildlife species, including species protected under the Endangered Species Act, conversion to non-native species, and reduced water quantity and quality, among other impacts. Through the management actions outlined in this document, as HMAs reach AML, the BLM would begin the process of rehabilitating rangelands that have been degraded by the overpopulation of wild horses and burros

Factors for Success: The factors for success in preparation for any restoration or rehabilitation efforts are:

- Prior to initiating any range restoration efforts, HMA populations should be at AML. For many HMAs this would require several years of removals, as well as the application of population suppression treatments. Occasionally, such as following a large wildfire, the entire herd will need to be removed from an area to allow revegetation;
- Monitoring data would be needed to determine if range conditions are not meeting rangeland health standards and appropriate treatments can be designed to begin the slow process of rehabilitating rangelands; and
- Identifying effective methods for restoration and rehabilitation.

Expected Results: Rangeland restoration in the arid West, where possible, will take several decades even with concerted restoration efforts. However, there are some areas that may never recover from the degradation caused by the overpopulation of wild horses and burros.

Funding Needs:

This analysis does not consider what funding needs would be required to do this restoration work; however, any delay in implementing a large-scale reduction of wild horse and burro populations will aggravate rangeland degradation, prolong restoration efforts and decrease their likelihood of ultimate success, and require targeting of and make less feasible the restoration of these lands.

Program Management and Oversight

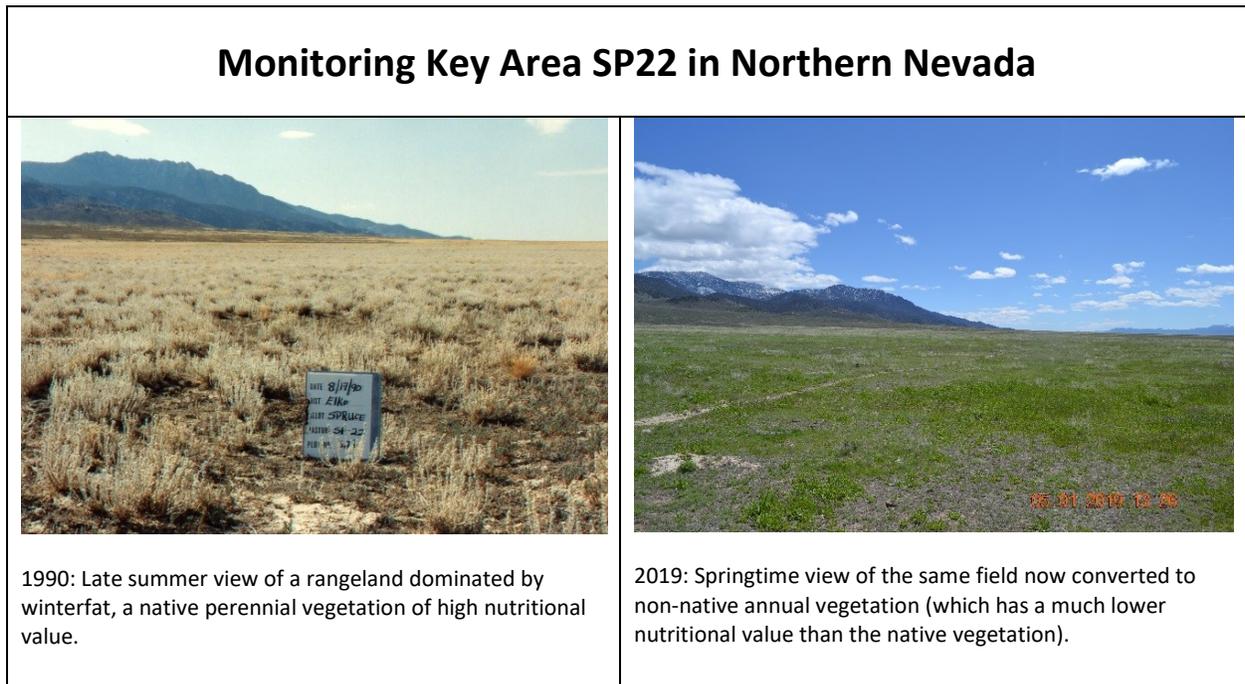
As with any program, the BLM's program management and oversight are critical. The BLM continues to focus its efforts to fund on-the-ground work, while keeping overhead costs low.

Regulatory Changes

The Committee directed the BLM to immediately begin designing the regulatory framework and technical protocols for an active sterilization program. The BLM started this process in Spring 2019, alongside additional changes to regulations to better implement various activities within the overall program. This includes developing regulations where none currently exist (e.g. for the Sales Program).

Conclusion

BLM's management activities require continued focus, improvement, and innovation to reverse declining rangeland health conditions on portions of the 25 million acres of public land now occupied by wild horses and burros. Surrounding lands may also be at risk, as animals lacking water or forage migrate to adjacent State, private, Tribal, or other Federal lands. With this migration would come increased safety concerns, such as animal incursions onto highways and even into private housing subdivisions where they may pose a risk to public safety. In addition, increased horse and burro populations impact other wildlife. For example, riparian areas that are used by multiple species, including wild horses and burros, will see further degradation. This can already be seen throughout the west, where vegetation has been lost or converted, as shown in the following photos in Nevada:



In other cases, much of the vegetation can be severely depleted from an area, such as in Antelope Valley, as can be seen in the photos below:

Antelope Valley Nevada



1984: Horse population was 449. Highly vegetated ground cover.



2017: Horse population had risen to 1,320. Only large shrubs and trees remain with only light ground cover.

While these examples involve rangeland with high wild horse and burro populations, similar disturbing impacts would expand to lands throughout the West as populations in all HMAs grow exponentially, eventually into areas outside the current HMA boundaries.

To address these challenges, BLM must reduce the number of wild horses and burros on the range, and this analysis demonstrates the potential resource implications associated with various non-lethal management approaches necessary for the BLM to stabilize (over the initial four to five years) and reduce (over the subsequent ten years) on-range populations, to achieve AML (by about Year 15), and maintain appropriate populations thereafter. The analysis shows that the overall funding requirements could be staggering; they start at almost \$117 million in the initial year and increase over time with inflation and additional on-range and off-range activities.

Achieving AML, maintaining AML, and caring for horses and burros off-range will require significant resource commitments during the next 10-20 years to fully realize the BLM's responsibilities under the Act. The BLM is committed to improving population growth suppression, removals, private care placements, and off-range holding activities to keep healthy herds on healthy landscapes.

Appendix A: Report Language Pertaining to this Report

In Report language accompanying the FY 2019 Appropriations Act, Congressional committees requested the BLM to provide information about the Wild Horse and Burro Program.

This language is as follows:

The Conferees fully recognize the financial and political challenges of controlling wild horse and burro populations and note that significant management changes need to be made within the near future in order to control costs, improve range conditions, and humanely manage wild horse and burro populations. As such, the Conferees reiterate their appreciation for the Bureau's April 26, 2018, report titled "Management Options for a Sustainable Wild Horse and Burro Program" but believe additional analysis is needed as directed by House Report 115-765. This analysis should be provided to Congress no later than 180 days after enactment of this Act. The Bureau is expected to continue evaluating its internal policies, procedures, and regulations to reduce costs and administrative burdens, as well as researching and developing appropriate, humane protocols for fertility control methods, including sterilization, and improve its contracting for off-range holdings. It is incumbent upon the Bureau to request the funding necessary to address this growing problem; better management of this program now will result in fewer dollars necessary in the future to restore the lands that wild horses, burros, and other wildlife depend upon.

The language referred to (House Report 115-765) is as follows:

The Committee appreciates the April 26, 2018, report to Congress titled "Management Options for a Sustainable Wild Horse and Burro Program" and recognizes the challenges Congress, the Bureau, and interested stakeholders face in setting this program on a better course to reduce costs, improve the condition of the range, and ensure a healthy wild horse and burro population. The Committee strongly encourages all parties to work together to address these challenges.

The Committee requests that the Bureau conduct an analysis that identifies factors for success, total funding requirements, and expected results on potential options that (1) remove animals from the range; (2) increase the use of sterilization; (3) increase the use of short-term fertility control; (4) provide an adoption incentive of \$1,000 per animal; and either (a) allow animals older than 10 years of age to be humanely euthanized; or (b) prohibit the use of euthanasia on healthy wild horses and burros.

The Committee also requests an analysis on (1) options to enter into long-term contractual or partnership agreements with private, non-profit entities to reduce the cost of holding wild horses and burros for their natural lives and (2) the feasibility of

assigning full responsibility for care for wild horses and burros removed from the range to these types of entities.

The Committee further directs the Bureau to immediately begin designing the regulatory framework and technical protocols for an active sterilization program. The Bureau should ensure it considers the health and welfare of individual wild horses and burros and their populations and evaluates the costs of such a program. It also should draw upon the expertise of Federal, State, and private equine veterinarians, veterinary medical schools, and those with related training and experience.

In the bill, the Committee provides the Bureau legislative authority to manage groups of wild horses and burros as non-reproducing or single sex herds, including through the use of chemical or surgical sterilization.

The bill maintains existing protections regarding the sale and use of euthanasia for wild horses and burros and continues two general provisions within Title I allowing the Bureau to enter into long-term contracts and agreements for holding facilities off the range and for the humane transfer of excess animals for work purposes.

In addition, report language accompanying the FY 2020 Appropriations also asked the BLM to provide information regarding the Wild Horse and Burro Program:

Wild Horse and Burro Management.-For the wild horse and burro program, the bill contains a total appropriation of \$101,555,000, of which \$21,000,000 shall not be available for obligation until 60 days after the Bureau submits a comprehensive and detailed plan for an aggressive, non-lethal population control strategy. For purposes of the plan to be submitted, the directives expressed by the House and Senate in House Report 116-100 and Senate Report 116-123, respectively, shall prevail, particularly with respect to strict compliance with the Bureau's Comprehensive Animal Welfare Program. In addition, the plan shall also include no less than five consecutive years of detailed expenditure estimates beginning with fiscal year 2020. The plan shall also include a thorough discussion of the Bureau's proposed management of the logistical details of the strategy, including but not limited to: (1) the number of individuals currently assigned and actively working in the program and the number of additional personnel needed to implement the strategy; (2) the resources (including personnel and equipment) currently available for animal gathers and the increases needed in those resources to substantially increase the number of animals gathered for removal to achieve appropriate management levels; (3) the number of all short-term and long-term holding facilities currently under contract (including their current holding capacity and when those contracts expire), and an estimate of the number of additional facilities that will be needed and the Bureau's strategy to obtain those facilities, and; (4) the amount of fertility

control resources currently available, the additional resources anticipated to be needed and the plan for obtaining those resources, and the plan for administering those resources, all focused on implementing a strategy aimed at minimizing future removals and maximizing treatment and retreatment of on-range animals to maintain appropriate management levels. Finally, the Bureau shall brief the Committees upon submission of the report, and quarterly thereafter.

Appendix B: 5 Year Estimated Funding Table (\$ in millions)

	Year 1	Year 2	Year 3	Year 4	Year 5
Removals	\$ 8.97	\$ 18.04	\$ 18.58	\$ 17.22	\$ 17.73
Fertility Control	\$ 8.11	\$ 17.34	\$ 21.78	\$ 22.44	\$ 23.11
Private Care Placements	\$ 10.83	\$ 11.24	\$ 11.66	\$ 12.09	\$ 12.53
Off-Range Corrals	\$ 28.02	\$ 26.76	\$ 43.24	\$ 56.03	\$ 65.04
Off-Range Pastures	\$ 37.45	\$ 51.57	\$ 65.64	\$ 79.66	\$ 93.64
*Other Program Functions	\$ 23.42	\$ 24.05	\$ 24.10	\$ 24.56	\$ 25.95
Total Annual Funding**	\$ 116.81	\$ 149.00	\$ 185.00	\$ 212.00	\$ 238.00

The estimates in this analysis are intended to identify to the committees the severity of the program challenges in potential resource terms. These estimates should not be construed to imply Administration support for particular levels of appropriations for this program beyond FY 2021.

*Other program costs include such functions as research, monitoring, population surveys, HMAP development and updates, and program oversight.

**Total funding to stabilize on-range population growth over this 5-year window would be about \$900 million. The overall costs would continue to increase until AML is achieved. It is important to note that many factors could affect the out-year costs within this analysis (i.e. unanticipated increases in holding costs, lack of available pasture space, inflation beyond the reasonable estimates considered within this analysis, improved fertility control options, etc.). The costs related to each individual category listed above uses unit cost estimates based on actual data from recent year expenditures (along with reasonable inflation increases into the future).

Appendix C: Off-Range Facility Report

Wild Horse and Burro Off-Range Corral Report – February 2020					
State	Facility Name	Capacity	Horses	Burros	Total
<i>Preparation Facilities</i>					
Arizona	Florence Prison	1,000	66	355	421
California	Litchfield	1,000	610	208	818
California	Ridgecrest	975	609	47	656
Idaho	Boise	150	174	0	174
Nevada	Fallon	2,800	1,643	0	1,643
Nevada	Palomino Valley	1,825	1,634	16	1,650
Oregon	Burns	775	348	15	363
Utah	Delta	300	153	7	160
Utah	Axtell/Burro	1,200	0	687	687
Utah	Axtell/Horse	1,000	848	0	848
Wyoming	Rock Springs	775	535	0	535
Sub-Total		11,800	6,620	1,335	7,955
<i>Maintenance Facilities</i>					
California	Elk Grove Prison	50	28	0	28
California	Redlands	20	0	0	0
Colorado	Canon City Prison	50	67	2	69
Idaho	Bruneau	2,800	1,429	0	1,429
Idaho	Challis	0	116	0	116
Kansas	Hutchinson Prison	350	317	2	319
Illinois	Ewing	275	132	5	137
Montana	Britton Springs	0	0	0	0
Nebraska	Elm Creek	475	301	7	308
Oklahoma	Pauls Valley	575	529	5	534
Nevada	Carson City Prison	2,000	1,129	49	1,178
Utah	Salt Lake City Staging	0	0	0	0
Wisconsin	Mequon	0	0	0	0
Wyoming	Riverton Prison	175	163	11	174
Wyoming	Wheatland/Mantle	200	197	4	201
Sub-Total		6,970	4,408	85	4,493
Total		18,770	11,028	1,420	12,448

Wild Horse and Burro Off-Range Pasture Report – February 2020					
Pastures					
State	Facility Name	Capacity	Horses	Burros	Total
Iowa	Mt Ayr/Geldings	400	408	0	408
Kansas	Cassoday/Geldings	2,011	2,165	0	2,165
Kansas	Grenola/Mares	2,600	2,569	0	2,569
Kansas	Matfield Green/Mares	550	557	0	557
Kansas	Teterville East/Geldings	1,720	1,445	0	1,445
Kansas	Teterville West/Mares	550	444	0	444
Kansas	Wallace/Mares	1,242	1,251	0	1,251
Missouri	El Dorado Springs/Mares	500	484	0	484
Montana	Ennis/Geldings	950	893	0	893
Nebraska	Atkinson/Mares	1,200	1,062	0	1,062
Oklahoma	Bartlesville/Geldings	2,175	2,040	0	2,040
Oklahoma	Catoosa/Geldings	2,000	1,831	0	1,831
Oklahoma	Chigley/Mares	500	509	0	509
Oklahoma	Davis/Mares	200	207	0	207
Oklahoma	Foraker/Geldings	1,400	1,454	0	1,454
Oklahoma	Foster/Mares	750	760	0	760
Oklahoma	Gray Horse East/Mares	1,735	1,847	0	1,847
Oklahoma	Gray Horse West/Geldings	1,015	835	0	835
Oklahoma	Hickory/Mares	1,600	1,566	0	1,566
Oklahoma	Henryette/Mares	1,017	1,017	0	1,017
Oklahoma	Hominy/Mares	1,059	1,117	0	1,117
Oklahoma	Hulah/Geldings	2,648	2,497	0	2,497
Oklahoma	Nowata/Mares	900	972	0	972
Oklahoma	Pawhuska/Mares	2,600	2,429	0	2,429
Oklahoma	Ringling/Mares	1,164	1,260	0	1,260
Oklahoma	Stratford/Mares	100	101	0	101
Oklahoma	Strohm/Mares	850	807	0	807
Oklahoma	Tishomingo/Mares	600	639	0	639
Oklahoma	Vinita/Geldings	200	195	0	195
Oklahoma	White Oak/Geldings	500	477	0	477
South Dakota	Vale/Geldings	1,000	965	0	965
South Dakota	Whitehorse/Geldings	400	361	0	361
Utah	Fountain Green/Mares	700	513	0	513
Sub-Total		36,836	35,677	0	36,526
Public Off-Range Pastures					
Oklahoma	Coalgate	350	359	0	359
Wyoming	Centennial	350	364	0	364
Kansas	Ellsworth	200	224	0	224
Wyoming	Lander	225	201	0	201
Sub-Total		1,125	1,148	0	1,148
Total		37,961	36,825	0	36,825

Grand Total in All Off-Range Facilities: 49,273

Appendix D: Current Permanent Full-Time Employees Dedicated to the Wild Horse and Burro Program

- National Office: Division Chief, Senior Wild Horse and Burro Specialist, Program Coordinator, Budget Analyst (4 FTE)
- On-Range Branch: Branch Chief, 3 Wild Horse and Burro Specialists, Staff Assistant, Management and Program Analyst, Public Affairs Specialist, Research Coordinator, Comprehensive Animal Welfare Program Specialist (9 FTE)
- Off-Range Branch: Branch Chief, Outreach Specialist, Private Care Placement Coordinator, Information Assistant, 2 Project Inspectors, Management and Program Analyst, Wild Horse and Burro Specialist (8 FTE)
- 12 State Leads
- Each state has varying number of wild horse and burro specialists (30 FTE)
- There are also BLM staff at BLM-managed and Contract holding facilities (40 FTEs)
- In addition to these employees, various employees throughout the BLM actively participate in and support program activities (about 35 FTEs).