



FY2024 McCullough Peaks Wild Horse Bait Trap Gather Questions and Answers

Why is the McCullough Peaks gather necessary?

With few natural predators that can control population growth, wild horse herds typically grow 20 percent per year, doubling in size every four to five years if not managed. Rapid herd growth can quickly overwhelm the food and water available to wild horses, which can impact the health of the animals and of the land. Prior to the start of the gather, there were approximately 175 adult wild horses in the herd management area, based on direct counts, while the appropriate management level (AML) is 70–140 horses.

The BLM is required by law to manage and protect wild horses and burros under the authority of the [Wild Free-Roaming Horses and Burros Act of 1971](#).

How many horses will you remove from the herd?

The BLM has adjusted the anticipated number of wild horses that the agency intends to remove in order to reach high appropriate management level in the McCullough Peaks herd. On Jan. 1, 2024, wild horses born in 2023 were added to the total population*. The purpose of this gather continues to be to return the population to the high end of its appropriate management level, which would require the removal of approximately 43 wild horses.

*According to [BLM Handbook H-4700-1](#), *Wild Horses and Burros Management Handbook*, "WH&B 1 year of age and older are considered adults. A foal is considered 1 year of age on January 1 of the year following its birth."

Why did you separate a 6-month-old foal from its mother and remove it?

On February 22, the BLM gathered four horses, including a 6-month-old female horse. As is standard practice, at six months old, [she was old enough to be safely weaned](#). The four horses were transported together to the BLM wild horse corral in Rock Springs, where they are being closely monitored and are doing well. They will eventually be prepared for adoption to qualified homes.

Why are you removing older horses that aren't as adoptable as young horses, instead of allowing them to live out their lives on the range?

As detailed in the [McCullough Peaks HMA Bait Trap Gather Environmental Assessment](#), during the initial gather, the BLM will not remove horses older than 15 years from the HMA. In subsequent years, older horses may be removed if they become a nuisance, for safety, or in an emergency. None of the horses removed have been older than 15 years.

The purpose of this gather continues to be to return the population to the high end of its appropriate management level—140 horses. The BLM may remove any horse 15 years old or younger to meet this purpose.

You aren't supposed to be trapping during foaling season. Why aren't you following your own regulations?

Peak foaling season of wild horses on public lands occurs in late April and early May. The great majority of foaling happens March through June. As a precaution, unless there is an approved emergency situation, BLM policy prohibits the use helicopters to gather wild horses from March through June, though bait-trap gathers may still be conducted. The BLM's Comprehensive Animal Welfare Program includes provisions to protect the welfare of foals that are part of gather operations, and the BLM is committed to the safety of all animals under our management. Mares with unweanable foals, if targeted for removal from the herd, would be removed together and kept together at the Rock Springs Wild Horse Holding Facility until old enough for weaning.

How did the one-year-old horse die?

Unfortunately, there was an incident led to the death of a sorrel mare that was over 1-year-old. At some point overnight on either the night of Jan. 23 or early in the morning of Jan. 24, the sorrel mare died in the temporary holding corral established for the bait-trap gather. The four horses in the corral were to be shipped to Rock Springs Off-Range Corral the morning of Jan. 24. The four horses that were removed on Jan. 22 were calm throughout the process, from loading on and off the trailer, to adapting to the temporary holding corral. When BLM staff checked in on the horses again that evening, they were calmly eating hay and drinking water. There were no issues.

When discovered on Jan. 24, the sorrel mare was immediately taken to a veterinarian in Cody for a necropsy. The veterinarian determined that the horse died of head trauma, likely from running into a post in the corral. BLM staff have strictly adhered to the Comprehensive Animal Welfare Program throughout the gather. The Comprehensive Animal Welfare Program outlines required best practices and humane handling standards that prioritize the health and well-being of the wild animals.

Injuries to wild horses during gathers are rare. The vast majority (98-99%) of animals are gathered without severe incident or injury that causes death. A recent study published in the Journal of Equine Veterinary Science found that the BLM's gathers are considered much safer than similar gather operations (usually for scientific research projects) of elk, deer, and caribou.

Are you following requirements under the Comprehensive Animal Welfare Program?

The Cody Field Office has been evaluated to be sure we're adhering to the Comprehensive Animal Welfare Program required best practices for bait trap gathers, which we are. The bait trap gather will continue, with the goal of returning the McCullough Peaks population to its high appropriate management level of 140 horses. And we will continue to focus on the safety of the

horses and meeting the required best practices for bait trap gathers under the Comprehensive Animal Welfare Program.

How will BLM monitor the safety of the horses in the trap?

Staff monitor the traps from a close distance using cameras that notify us immediately if a horse is in a trap. While we can monitor the traps remotely, we only close the gates manually. Until staff closes the gate onsite, the horses are free to move in and out of the trap.

If you are treating the mares annually with fertility control, why do you still need to conduct this gather?

Since 2011, the BLM has worked with its partners to reduce the growth of the McCullough Peaks herd to approximately 2 percent annually through a fertility control darting program. Herd growth continues, albeit relatively slowly, because:

1. Several mares have not responded to fertility control treatments.
2. The BLM allows each mare to foal once to provide genetic diversity to the herd.
3. The McCullough Peaks horses live on average 5 years longer than the average wild horse for multiple reasons:
 - a. Mares treated regularly with fertility control have better overall health, as they do not experience the biological stress of reproduction, foaling and lactation as frequently as untreated mares.
 - b. There is a general lack of natural predators in the HMA.
 - c. Other factors such as the availability of water sources and sustainable forage within the HMA, and mild winters, may also contribute to longer lifespans.

How will you ensure the genetic diversity of the herd?

Our goal is to maintain a genetically viable herd and we are taking a hard look at which horses will be removed. We will primarily remove horses that are five years old and younger because they are more adoptable than older horses. However, we may remove horses from across the age classes (except over age 15) to reflect a normal growth year. Twelve foals were born in 2023. With this addition to the five-and-under age group, that segment of the population will remain well represented in the population.

Gathering horses to the high appropriate management level of 140 horses should provide for acceptable genetic diversity and diversity can be monitored with further genetic testing

What will happen to the wild horses removed from public lands?

Gathered horses selected for removal will be transported to the Rock Springs Wild Horse Off-Range Corral where they will be checked by a veterinarian, prepared for adoption, and then offered for adoption in 2024 in the BLM's Wild Horse and Burro Online Corral to qualified applicants. If any of the McCullough Peaks horses are not adopted in the online corral, they could be transferred to one of BLM Wyoming's contracted trainers (the Wyoming Honor Farm

or Mantle Adoption and Training Facility) to be trained and then offered again for adoption. Any unadopted horses would eventually be transferred to a pasture facility where they will have ample space to roam and graze for the remainder of their lives.

The horses gathered require proper shelter while in temporary holding and on the off-range-corrals. Isn't it cruel to the horses to send them to the facility in Rock Springs?

Wind and cold are part of life in Wyoming. Wild horses are acclimated to the weather, including wind, temperatures and snowfall, as well as to the wide-open, desert terrain that provides few natural windbreaks. Horses grow a coat of long, thick winter hair that insulates them from the cold by trapping heat to maintain body temperature. Snow can accumulate on top of these winter coats and act as an insulating blanket without moisture penetrating to the skin or drawing away body heat. With this winter coat, Wyoming-acclimated horses are well adapted to the Wyoming winters. On the range and in corrals, horses band together and rotate to protect one another from the wind. According to wild horse and burro specialists, facility managers and veterinarians, wind breaks at the facility are not necessary since the acclimated horses are fed and watered daily, are in good body condition and are able to band together as a herd. The BLM may require adopters to provide shelter (43 CFR 4750.3-2) because they may have too few horses to service this important herd function.

Why doesn't the BLM reduce livestock grazing instead of gathering wild horses?

Reducing grazing to shift forage use to wild horses would not be in conformance with the Cody Resource Management Plan and is contrary to the BLM's multiple-use mission. It was Congress' intent to manage wild horses as one of the many uses of the public lands, not the single use. Therefore, the BLM is required to manage wild horses on healthy and productive public lands, in balance with wildlife, domestic livestock, vegetation and other uses.

Additionally, livestock are managed by grazing permits. They can be confined to specific pastures and limited to specific periods/seasons of use to minimize impacts to public lands. Conversely, wild horses are present year-round, and their impacts to rangeland resources cannot be controlled through establishment of a grazing system. Thus, impacts from wild horses can only be addressed by limiting their numbers to a level that does not adversely impact rangeland resources and other multiple uses.

Returning the population of wild horses to within the herd's AML is expected to help maintain and possibly improve rangeland conditions, providing positive impacts to the vegetation which would benefit both livestock and wild horse grazing, as well as local wildlife.

With so many older horses in the herd, why doesn't the BLM wait until after the winter before removing horses?

Wild horses are well adapted to the Wyoming landscape and climate. While annual losses of horses from winterkill do occur, they are outpaced by population growth. The 2022-2023 harsh winter did not cause an above average die-off and it's not expected to occur this winter either.

Is GonaCon-Equine safe to use on wild horses as a fertility control vaccine?

GonaCon-Equine is a safe vaccine that is registered with the EPA and approved for use in wild horses. Capitalizing on the agency's successful research and development efforts, the BLM has been increasing its use of GonaCon-Equine to manage population growth. It's now used in over 15 HMAs throughout the west. One dose of GonaCon can cause moderate effects that may last two years, but a second dose can prevent pregnancy for 4-5 years.

Will the BLM use GonaCon on all the mares?

No, GonaCon may be used to treat mares that are over age 13 that have already contributed to the genetic diversity of the herd and other mares that are not responding to PZP. The BLM will continue to apply PZP to all other mares in the herd, while ensuring that younger mares have the opportunity to contribute to genetic diversity when needed by skipping PZP doses.

If a mare is not responding to PZP after the normal 10-12 month treatment window, the BLM would first change that mare's treatment window to every six months. If that mare foals again, GonaCon could be used.

Will the McCullough Peaks herd go extinct in a few years if you remove 35 horses?

No. The gather will not bring the horse population below the high end of the appropriate management level, which has been set at 140. This will provide for a healthy, reproducing herd of wild horses into the future.

How does the BLM determine if a potential adopter is on the "up and up" and the adopted animal is not destined for a slaughterhouse in Canada or Mexico?

The BLM screens potential adopters alongside a list of individuals that have been determined to be ineligible. All animals adopted from BLM are subject to inspection by BLM specialists prior to being titled. This is to ensure that the adopter is complying with all requirements of their Private Maintenance and Care Agreement (PMACA) relating to animal welfare/wellbeing. Where deficiencies are found, BLM works with the adopter to correct them. If compliance is not or cannot be attained, the adopter will either voluntarily relinquish the animal back to BLM or BLM will repossess the animal. In the latter case, if a determination is made that an adopter violated any of the Prohibited Acts outlined in their PMACA, the agency may issue a Decision Letter that would render them ineligible to participate in the adoption program in the future. Certain violations – such as selling/transferring animals prior to receiving title – may also be referred to BLM Law Enforcement for investigation and, from there, potentially to the appropriate U.S. Attorney who may exercise discretion whether or not to prosecute.

More information about the requirements for adopting can be found at [Adoption Program | Bureau of Land Management \(blm.gov\)](https://www.blm.gov/adopt).