



# United States Department of the Interior



## BUREAU OF LAND MANAGEMENT

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In Reply Refer To:  
4730 (WY 930) P  
Ref: DOI Manual446  
BLM Manual 4730  
BLM Manual 1112-2  
BLM Handbook 1112-Ch. 26

February 13, 2012

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Instruction Memorandum No. WY-2012-035  
Expires: 9/30/2013

To: District Managers  
From: State Director  
Subject: Use of Firearms by Wyoming Wild Horse and Burro Personnel

**Program Area:** Wild Horse and Burro Program

**Purpose:** This Instruction Memorandum (IM) is to provide guidance in complying with 446 Department Manual and Bureau of Land Management (BLM) Manuals 1112-2, 4730, and BLM Handbook 1112-1 - Chapter 26, pertaining to the authorization, use, storage, issuance, and qualification with the Bureau issued firearms by wild horse and burro personnel.

The BLM Wyoming is responsible for the training of wild horse and burro personnel. These personnel include field specialists, facility supervisors, and staff. These persons are identified as using firearms. The Wyoming Wild Horse and Burro Program Lead will be responsible for the oversight of procuring the firearms and ammunition issued.

The BLM Wyoming has specific requirements regarding carrying, transporting, and the firing of firearms.

### **Training and Authorization Requirements**

Prior to requesting a BLM Wyoming issued firearm, transporting any firearm to a work location, or carrying any firearm in the field while on official business, employees must request and receive official written authorization from the State Director. This applies to Government-owned firearms. Personally owned firearms will not be authorized. The following personnel **will not** be authorized to carry a firearm:

1. Convicted felons who have not had their right to carry firearms reinstated;
2. Employees who have been convicted of domestic abuse or are under a current restraining order or criminal charges related to domestic abuse;
3. Employees and volunteers under 18 years of age;
4. Volunteers.

Criminal history queries will be conducted on any employees requesting authorization to carry a firearm.

In order to obtain authorization to carry a firearm in the field, an employee must first complete the National Rifle Association (NRA) classroom training on firearms safety, be instructed on wild horse and burro behavior, and proper euthanasia techniques by a veterinarian, and then pass a firearms proficiency test. The BLM Safety Manual Handbook H-1112-2 specifies requirements for instructor certification (Section 17.4), classroom instruction (Section 17.4.A), and proficiency testing (Section 17.4.B). Classroom instruction will be conducted annually and proficiency testing will be conducted semi-annually.

Training will consist of the following:

1. Basic firearms safety and maintenance (Firearms Instructor);
2. Legal and moral aspects of firearms use (Firearms Instructor);
3. Shooting Range Proficiency (Firearms Instructor);
4. Proper euthanasia of a horse using firearms (Veterinarian);
5. Henneke Body Condition Scoring (Veterinarian).

Firearms training must consist of 4 hours of classroom time in accordance with BLM Handbook 1112-1, chapter 26.4, culminating in a prescribed shooting regimen at a firing range. Instructor conducting the training will be a certified Federal Law Enforcement Training Center graduate, Federal Bureau of Investigation Officer, or a National Rifle Association Instructor. For the proper procedure to euthanize a horse or burro with a firearm, a veterinarian who is knowledgeable and experienced in the euthanasia of horses or burros with a firearm will conduct that portion of the training.

For shooting proficiency testing and euthanizing wild horses, the trainee shall shoot three rounds at 25 yards and again three rounds at 100 yards with a rifle. For a handgun only the 25 yard shooting proficiency test will be followed. The trainee is proficient when 70 percent of the shots are on an 8 ½ X 11 inch target and the instructor deems appropriate. Each sequence may be performed twice, but will be up to the decision of the instructor. The trainee (shooter) must exhibit proper safe handling of a firearm.

The BLM Safety Manual H1112-1 (Section 26.2) specifies that only State Directors may authorize a non-law enforcement employee to carry a firearm while on official duty. Upon an employee's successful completion of the prescribed training, background clearance, and proficiency testing, a letter of authorization from the State Director's office will be sent to the employee's manager; the manager ensures a copy of the letter is delivered to the employee. The employee is then authorized to transport and carry a firearm on official business for the purpose of humanely euthanizing injured or sick wild horses or burros.

Authorizations to carry firearms are effective for 1 year. Proficiency testing must be repeated prior to reauthorization each year.

Due to the statistically demonstrated high hazard level associated with carrying and handling firearms, a Firearms Instructor shall refuse to authorize an employee to carry a firearm if the employee demonstrates an obvious lack of situational awareness or appropriate level of caution with a firearm regardless of the employee's otherwise successful completion of the proficiency course of fire.

Copies of all authorizations to carry firearms, training records, and written reports documenting discharge of a firearm will be maintained by the Wyoming Wild Horse and Burro Program Lead.

### **Humane Destruction of Wild Horses and Burros**

Whenever it is necessary to destroy a wild horse or burro at a BLM facility, on-the-range, or during gather operations as an act of mercy, the destruction must be away from public view whenever possible. Only personnel who have been authorized by the Wyoming State Director will destroy a wild horse or burro with a Bureau issued firearm. In situations such as during a gather operation or on-the-range, field specialists need to be trained and have a good understanding of the Henneke Method of determining a wild horse's or burro's body condition and/or health reason prior to destroying the animal.

Wild horses or burros that need to be destroyed at an adoption event with attendance by the public will not be destroyed by use of a firearm. If this need arises a veterinarian will humanely euthanize the animal. If at all possible, the sick or injured animal will be removed from the adoption site and transferred to a veterinary clinic or location where the animal can be euthanized safely.

Only the authorized officer as described in BLM Manual 4730 can authorize the destruction of a wild horse or burro. Washington Office. IM No. 2009-041 (Appendix 2) provides the most recent guidance concerning euthanasia and circumstances when it is authorized. If there is any question as to the extent of injury or sickness of the animal, a veterinarian should be consulted by phone and/or accompany the wild horse and burro specialist to determine if destruction is the most humane course of action.

### **Firearm Type**

The firearm to be used by field specialists for euthanasia of wild horses "on-the-range," will be a center fire rifle. For gather or facility operations a hand-gun should be used.

### **Discharge of Firearms**

Upon any discharge of a firearm, the involved employee must complete a written report documenting the circumstances involved in the discharge of the firearm. This report will identify the firearm that was used, and include a description citing the need for euthanasia and will be forwarded to the Wyoming Wild Horse and Burro Program Lead.

### **Procurement**

All requests to purchase firearms must be sent through the Wyoming Wild Horse and Burro Program Lead.

### **Storage and Security Requirements**

The BLM Safety Manual Handbook H-1112-2 (Section 17.6), requires non-law enforcement firearms not in active use to be stored in an unloaded condition, in a secure place, out of sight, and in an approved and secured safe. Only the wild horse and burro specialists or Law Enforcement Officers, who are authorized to use firearms, will have access to their secure storage unit.

Each Field Office or BLM corral facility with authorized personnel will have a designated secure place for storage of Bureau issued firearms and ammunition. Non-law enforcement firearms **will not** be stored in law enforcement firearms vaults.

In order to further ensure the safety of our employees, their families, and the public, all BLM personnel responsible for Bureau issued/approved firearms will also use an effective and fully engaged trigger locking mechanism on any firearm that is being stored or transported.

This requirement applies to any non-law enforcement firearm regardless of the length of time it will be stored or the distance it will be transported. The firearm will remain in the storage unit except for:

1. A firearm actively being carried for its intended purpose in a field situation;
2. For the purpose of qualifications;
3. When a situation arises that demands the destruction of a wild horse or burro; or
4. When there is a significant, potential need for euthanasia, such as during a gather, or within a BLM prep facility.

Lockable hard-sided cases and locking gun cabinets do not meet the requirements of this policy and will not negate the requirement for trigger locking mechanisms.

### **Transportation**

When traveling, the firearm will be secured in a lockable, hard-side, gun case approved by the State Firearms Officer. Firearms will be unloaded at all times except when actually needed.

No firearms will be left in a Government vehicle overnight. When authorized personnel are away from their duty station, they will remove the firearm from the vehicle and store in a secure place, locked in a hard side case.

Allowing employees who are not law enforcement officers to carry firearms in the field is a sensitive matter. Our firearms program is subject to intense scrutiny by our agency and the public. Highly professional training, constant situational awareness, accurate data, and strict adherence to these policies will help ensure that we continue to maintain the ability to authorize our employees to carry weapons in the field for protection against dangerous animals and be used to euthanize wild horses.

Violations of this policy will result in the loss of the employee's authorization to carry a firearm. Threatening behavior toward other people involving a firearm is cause for disciplinary and legal action.

**Timeframe:** This IM is effective upon issuance. Compliance to this IM should not add any significant time delays to the management of wild horses and burros.

**Budget Impact:** Costs associated with implementation of this IM will include the procurement of ammunition, lockable hard-sided cases, trigger locks, gun cleaning kits, spotting scopes and securely anchored gun safes for each Field Office that manages wild horses and the Rock Springs Wild Horse and Burro Corral.

**Manual/Handbook Sections Affected:** This IM is in compliance with 446 Department Manual and Bureau of Land Management (BLM) Manuals 1112-2, 4730, and BLM Handbook 1112-1, pertaining to the authorization, use, storage, issuance, and qualification with the Bureau issued firearms by wild horse and burro personnel.

**Coordination:** The requirements outlined in this policy have been reviewed by the Wyoming BLM Field Specialists, the Wyoming BLM Wild Horse and Burro Program Lead, the BLM Wyoming Chief Ranger, and the BLM Wyoming Safety and Health Manager.

**Contact:** If there are any questions concerning this policy, please contact June Wendlandt, Wyoming BLM Wild Horse and Burro Program Lead and/or Perry McCoy, Wyoming BLM Chief Ranger and/or David Scott, BLM Wyoming Safety and Health Manager.

Signed By:  
Donald A. Simpson  
State Director

Authenticated By:  
Sherry Dixon  
Secretary

2 Attachments:

- 1 - Appendix 1- Sample Firearms Authorization Letter (1 p)
- 2 - Appendix 2 – Washington Office IM 2009-041, Euthanasia of Wild Horses and Burros for Reasons Related to Health, Handling and Acts of Mercy (5 pp)

Distribution

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